

FINAL ENVIRONMENTAL ASSESSMENT  
PEARL HAVEN PAVILION AND MASTER PLAN  
HO`OLA NA PUA  
RESIDENTIAL SPECIAL TREATMENT FACILITY

---



*Prepared for  
State of Hawai`i  
Department of Land and Natural Resources*

*November 3, 2021*

**Final Environmental Assessment (FEA)  
Pearl Haven Pavilion and Master Plan  
Ho‘ola Nā Pua Ho‘ola Nā Pua Residential Special Treatment Facility, Oahu,  
Hawai‘i**

**Approving Agency**

State of Hawai‘i Department of Land and Natural Resources  
1151 Punchbowl Street, Room 220  
Honolulu, HI 96813

**Applicant**



58-130 Kamehameha Highway  
Haleiwa, Hawai‘i 96712

**Prepared by**



**NORTH SHORE CONSULTANTS, LLC**

66-031 Mahaulu Lane  
Hale‘iwa, HI 96712

**PROJECT SUMMARY**

**PROJECT NAME:** Pearl Haven Pavilion and Master Plan  
**APPLICANT/LESSOR:** Ho‘ōla Nā Pua, Inc.  
58-130 Kamehameha Highway  
Haleiwa, Hawai‘i 96712

**PROJECT LOCATION:** Waiale‘e Ahupua‘a, Waialua District, Oahu  
**TAX MAP KEY:** (1) 5-8-001: 051  
**PROPERTY OWNERSHIP:** State of Hawai‘i Department of Land and Natural Resources  
**LOT AREA:** 12.854 acres 559,920 s.f.  
**EXISTING USE:** Treatment facility for sexually exploited children  
**PROPOSED USE:** The primary action covered in this assessment is the renovation of the former boy’s dormitory that is now in ruins on the property. The renovated structure will be an open-air pavilion for special events and training. Other amenities including gardens, sports courts, agricultural structures and hiking trails are discussed.  
**STATE LAND USE:** Agriculture  
**COUNTY ZONING:** Agriculture District (Ag-2),  
**SPECIAL DISTRICT:** Within the Special Management Area  
**ACTION REQUESTED:** Use of State Lands  
**APPROVING AGENCY:** State of Hawai‘i Department of Land and Natural Resources

**DETERMINATION:** Finding of No Significant Impact (FONSI)

**PERMITS REQUIRED** Building permits and SMA (major)

**AGENCIES CONSULTED:** Department of Land and Natural Resources Land Division  
US Fish and Wildlife Service  
DLNR State Historic Preservation Division  
Department of Planning and Permitting, City and County of Honolulu

## Table of Contents

<u>1.0 INTRODUCTION.....</u>	<u>6</u>
1.2. HO`OLA NĀ PUA’S MISSION.....	7
1.3. PROJECT LOCATION.....	11
<u>2.0 PROPOSED ACTION.....</u>	<u>13</u>
2.1 THE PEARL HAVEN PAVILION .....	13
2.2 SPORTS FIELDS, RIDING CENTER, GARDENS, HIKING TRAILS AND RELATED AMENITIES .....	21
2.3 AGRICULTURAL STRUCTURES .....	22
2.4 STAFF HOUSING .....	22
2.5 FARM STAND .....	22
2.6 OTHER SITE IMPROVEMENTS.....	23
2.7 PERMITS AND APPROVALS .....	23
<u>3.0. ENVIRONMENTAL SETTING, ANTICIPATED IMPACTS, AND MITIGATION MEASURES .....</u>	<u>23</u>
3.1 EXISTING LAND USE .....	23
3.2 SOCIOECONOMIC CHARACTERISTICS.....	24
3.3 WEATHER AND CLIMATE .....	25
3.4 TOPOGRAPHY, GEOLOGY AND SOILS.....	25
3.5 SURFACE WATER AND DRAINAGE.....	27
3.6 CLIMATE CHANGE AND COASTAL HAZARDS.....	29
3.7 BIOLOGICAL RESOURCES. ....	29
3.8. ARCHAEOLOGICAL, CULTURAL AND HISTORIC RESOURCES .....	30
3.9 SCENIC AND VISUAL RESOURCES .....	34
3.10 TRAFFIC IMPACTS .....	34
3.11 NOISE ENVIRONMENT .....	34
3.12. AIR QUALITY .....	35
3.13. PUBLIC UTILITIES AND INFRASTRUCTURE .....	35
3.14. PUBLIC SERVICES.....	36
<u>4.0 ALTERNATIVES TO THE PROPOSED ACTION.....</u>	<u>36</u>
4.1 NO ACTION ALTERNATIVE.....	36
<u>5.0 RELATIONSHIP TO PLANS, CODES AND ORDINANCES .....</u>	<u>37</u>

5.1 UNITED STATES .....	37
5.2 STATE OF HAWAII .....	38
5.3 CITY AND COUNTY OF HONOLULU .....	40
<u>6.0 GROWTH-INDUCING FACTORS, SECONDARY AND CUMULATIVE IMPACTS .....</u>	<u>42</u>
6.1. IRREVERSIBLE AND IRRETRIEVABLE COMMITMENT OF RESOURCES .....	43
6.2. ADVERSE IMPACTS WHICH CANNOT BE AVOIDED .....	43
<u>7.0 DETERMINATION .....</u>	<u>43</u>
7.1 DEFINITION OF SIGNIFICANCE .....	43
7.2 FINDING OF NO SIGNIFICANT IMPACT .....	45
<u>8.0 CONSULTED PARTIES AND PREPARERS .....</u>	<u>46</u>
8.1 AGENCIES AND INTERESTED PARTIES CONTRIBUTING TO THE ASSESSMENT .....	46
8.2 PREPARERS .....	46
<u>9.0 REFERENCES .....</u>	<u>47</u>

**Figures:**

Figure 1-1: Street View of the Subject Property  
Figure 1-2: Pearl Haven Treatment Program  
Figure 1-3: Location Map  
Figure 1-4: Parcel Map of the Location  
Figure 1-5: Aerial Photograph of the Location  
Figure 2-1: The Pearl Haven Master Plan  
Figure 2-2: Boy's Dormitory Building 1930  
Figure 2-3: Undated Early photograph of the Boy's Dormitory  
Figure 2-4: Boy's Dormitory in 2018  
Figure 2-5: South side view of the Boy's Dormitory 2020  
Figure 2-6: Interior view of the Boys Dormitory 2020  
Figure 2-7: Conceptual Design of Dormitory following renovation Front View  
Figure 2-8: Conceptual Design of Dormitory following renovation West View  
Figure 2-9: Conceptual Design of Dormitory following renovation North View  
Figure 2-10: Conceptual Design of Dormitory following renovation Interior View  
Figure 2-11: Pearl Haven Master Plan  
Figure 2-12: Example of the type of housing for resident staff  
Figure 3-1: Flood Insurance Rate Map  
Figure 3-2: Historical photo and map of the campus circa 1939  
Figure 3-3: Boys Dormitory 1935

**Tables:**

5-1 Development standards for the proposed development.

**Appendices**

Appendix A: Request for comments and comment responses



## 1.0 Introduction

Ho‘ola Nā Pua is a non-profit agency committed to providing care for children who have been exploited. Pearl Haven is a recently completed residential care facility on the North Shore of Oahu which provides a safe and supportive environment to meet the unique needs of children who have been traumatized by sexual exploitation. Pearl Haven was the subject of a previous Environmental Assessment (June 2015). The facility received a certificate of occupancy in February of 2021 and began operations shortly thereafter. Having met its requirements for this mission, Ho‘ola Nā Pua seeks to continue renovating structures that remain on the property and provide additional amenities such as gardens, sports courts, agricultural structures and hiking trails.

Pearl Haven is on property owned by the Department of Land and Natural Resources. The site was originally developed in 1903 as the Waiale‘e Training School, which was a detention center for under aged boys who would otherwise be sent to jail. The detention center operated until 1950 when the boys were moved into newer facilities in Windward Oahu. In 1953 the buildings and grounds were repurposed for the Crawford Convalescent Home which served as a care facility for kupuna until rising costs forced it to close in 2010. Crawford’s management staff maintained a presence and managed the buildings and grounds until 2014 when it was abandoned. Ho‘ola Na Pua was granted a lease in 2016 by which time the buildings were heavily vandalized and in disrepair. Following 5 years of permitting, fund-raising and construction the former buildings were modified to suit their new purpose and received the initial group of children in April 2021.



*Figure 1-1: A street view of the Crawford Convalescent Home in 2007. These buildings have been internally renovated, received a Certificate of Occupation, License to operate and welcomed its first residents in 2021.*

Having met the requirements to fulfill its mission Ho‘ola Nā Pua now seeks to continue to renovate buildings that remain from the Waiale‘e Training School, and add amenities including agricultural structures, sports fields, gardens, employee housing, and hiking trails.

This Environmental Assessment is prepared in conformance with the requirements of HAR Chapter 11-200 and the recently revised Hawaii Environmental Protection Act (HEPA). The proposed action triggers the requirement for public disclosure by its use of public land and possible public funding. The full site development is beyond the scope of that envisioned in the original FEA published in June 2015 and Hawaii has no provisions for a supplemental Environmental Assessment. Following a thorough review of comments received during the planning process associated with the Draft Environmental Assessment (DEA), the Approving Agency has reached a finding of no significant impact (FONSI).

Pearl Haven is constructed on what was originally the dining hall for the Waiale‘e Boys Industrial Training School originally completed in 1933. It was substantially renovated in 1957 by the Crawford’s Convalescent home. A second two-story addition to the convalescent home was built in the mid 1960s. Renovation of the buildings required over \$7.2 million but resulted in a renovated facility with floor area of slightly over 24,000 square feet. It can accommodate up to 32 residents at any time and will be operated by a staff of up to 50 professionals.

One of the most noteworthy features of the property are the ruins of the dormitory from the Waiale‘e Industrial School that was built in 1903 and abandoned around 1950. The ruins have withstood many years of varied environmental conditions, and a fire in 2004 that destroyed everything except the concrete and steel components. The remaining ruins are comprised of four concrete walls, gabled at the two ends, with window and door openings, and two decorative entry portals on the north/front entry side. Ho‘ola Nā Pua would like to upgrade the adjacent abandoned structure to provide a safe and functional outdoor pavilion, to further enhance the property and serve their program. The desire is to have the building remain an open shell as it currently stands, with repairs and improvements that will allow the structure to be utilized safely for program functions such as a resident meditation, therapy, and exercise. The character-defining features of the exterior would be retained and the appearance from the outside would be largely unchanged.

## 1.2. Ho‘ola Nā Pua’s Mission

Ho‘ola Nā Pua’s mission is to the prevention of sex trafficking and providing care for children who have been exploited. The Pearl Haven residential program provides child victims of sex trafficking with a therapeutic home with comprehensive services specific to the unique needs of children who have been sexually exploited. The home is beyond a structure, building, or a program. It is a safe place where healing and new life can begin. The mission is to provide a therapeutic environment where hope is given, and healing is experienced. The team of trauma trained advocates, mentors, and professionals are committed to the physical, mental, emotional and spiritual health and wellbeing of these children. It will provide resources on a long-term basis for holistic health care, compassionate counseling, remedial education, and eventual reintegration as contributing members of their communities. Ho‘ola Nā Pua’s staff and volunteer teams also work to reduce sex trafficking in Hawaii through a continuum of care that includes mentoring, group services for at risk youth,



education, training, public outreach, and legislative support to fight child exploitation and domestic child abuse.

The organization has several primary objectives:

1. Operate a residential treatment facility for exploited children: This long-term residential care facility houses youth who have been sex trafficked. The facility is a twenty-four-hour, therapeutic residence that embraces an environment committed to restoration and healing of children who have been sexually trafficked and to enable them to become contributing members of our island communities. This residence provides multiple therapeutic services including individual, family and group therapy, 6-12<sup>th</sup> grade education, animal assisted therapy, creative movement classes such as martial arts, yoga, and dance, and art and music programming such as hula, choir and ukulele lessons. The goal is to provide a culturally sensitive program suitable for Hawaii.
2. Provide outreach services to locate sexually exploited youth: The organization maintains a partnership with medical and human services providers including state and federal agencies and NGOs in order to identify and treat victims in an immediate compassionate and proactive manner to provide a short-term and long-term safe harbor for the survivors and ultimately reduce recidivism. Group services and mentoring programs aim to encourage youth to have difficult conversations and open up about past trauma as they work through lessons to encourage resiliency and healing.
3. Encourage system changes. Currently, hundreds of children are not being adequately screened and are often mislabeled or not identified as victims of sexual exploitation. They often continue within the system and their exploitation remains hidden. The goal is to work closely with Family Court and the state Human Trafficking Coordinator to develop a state-wide victim centered protocol beginning with initial identification and screening of children who have been sex trafficked and customizing a plan committed to healing and an extended period of restoration and intervention.
4. Increase awareness of sex trafficking in Hawaii through adolescent and adult education. Education will help to provide safeguards for threatened youth. Our prevention education programs aim to create an interactive community outreach to schools, businesses, organizations, healthcare personnel, law enforcement, and the general population in order to provide ongoing information and debriefings on how to recognize and combat sex trafficking, root out its causes, protect its victims, and promote a prevalent attitude of “not on our islands.”
5. Rebuke and penalize demand: Support legislation that protects the victims and penalizes the pimps and solicitors. Develop an initiative to fight pornography and support efforts to rescue children suffering from domestic abuse that are prime candidates for sex traffickers’ recruiting efforts.
6. Provide mentoring programs for exploited children
7. Organize support group meetings with families of exploited children

Pearl Haven is a state licensed facility providing comprehensive, holistic, individualized therapy for each resident who is placed within its care. Safety is our primary concern working with this

population. It is our mission to create a sanctuary that supports children in crisis. Residents of Pearl Haven will be provided with a safe place to heal as their physical, emotional, psychological, psychosocial, spiritual, educational, and reintegration needs are met. Our goal is to prepare each resident for successful transition and reintegration back into the community. The core concepts of trauma informed and gender-specific care are foundational aspects of our program. Core principles of trauma informed care include safety, attachment, trustworthiness, choice, collaboration, and empowerment.

This comprehensive program embraces the practice of Hawaiian values such as: Lokahi (unity and harmony), Mālama (caring), Hō ihi (respect), Ahonui (patience and enduring), Hilina`i (trust), Huikala (forgiveness), and Aloha (love). The use of the Hawaiian culture and its values is used in promoting a healthy recovery and restoration from severe trauma, which requires a comprehensive approach to healing.

The goal is to help each resident develop self-value, believe in themselves, achieve their goals and dreams, and embrace the value and meaning of their life by creating a trauma informed residential environment. All staff, mentors, and volunteers will utilize trauma informed gender-specific approaches to working with this population. Site selection, staff selection, program content that reflects an understanding of the realities of the lives of girls and addresses and responds to their strengths and challenges are core to gender responsive services. In addition to creating a trauma informed environment, utilization of the Trust Based Relational Intervention model (TBRI) is essential in the daily health, behavioral management and the healing process for youth. Pearl Haven trains all staff in TBRI, an evidenced-based practice that helps caregivers recognize the needs of youth and can be used in any environment. This holistic relationship-based model has come out of a broad scope of research-based practices. The principles and practices of TBRI empower residential caregivers to meet the needs of youth in a safe and nurturing way while being respectful of the impact of trauma. This attachment-based, trauma informed intervention has been used successfully with the child victims of sexual exploitation. Consultation with local and national mental health and counseling experts has been a key component in planning the program for this home.

Referrals to the Pearl Haven program will be through Hale Lanipolua Assessment Center, Family Court, Girls Court, Child Welfare Services (CWS), Child and Adolescent Mental Health Division (CAMHD), hospitals and private placement utilizing insurance. Referring agencies will complete the referral packet which will be reviewed by the Clinical Director. After eligibility is determined and clinical need assessed, their guardians and placing agency will meet with the Clinical Director for a pre-placement meeting to complete the admissions packet and consent forms. Intake date will be based on clinical necessity and what is best for each individual youth.

### Clinical Services

Through a carefully calibrated assessment process, and collaboration with the client and her family, an individualized Mental Health Treatment Plan (MHTP) is developed to address the client's risks and needs while taking into consideration her protective factors. Utilizing a variety of evidenced-based therapy modalities, Pearl Haven therapists tailor treatment to each individual client. Youth receive individual, group and family therapy throughout each week. Through evidence-based

modalities such as trauma focused cognitive behavioral therapy (TF-CBT), Trust Based Relational Intervention (TBRI), Eye Movement Desensitization and Reprocessing (EMDR), clients develop skills and strategies in individual therapy that support their successful transition back into their home community. Through TBRI Nurture Groups, Dialectical Behavioral Therapy (DBT), CSEC prevention groups, and trauma processing groups, youth receive treatment and support with their peers.

Equine therapy, canine assisted therapy, art therapy and music therapy will be utilized to help youth process their trauma and begin healing. Research has shown the effectiveness of these different therapies when working with youth who have experienced trauma.

### Family Engagement

Family involvement is integral to the success of our clients. We engage families as active participants in their daughter's treatment and discharge planning, and encourage their participation in family therapy, support groups, TBRI skills groups, spiritual and cultural celebration, and on-campus events such as graduations and holiday celebrations.

### Education

Pearl Haven provides 5th through 12th grade level courses through a structure that is conducive to the high needs of our client population, and with oversight by the Department of Education. The on-site school operates year-round, with classes running five days a week, and a curriculum aligned with the Hawai'i Academic Standards and utilizing the therapeutic TBRI classroom model.

### Adjunct programming and Extracurricular Opportunities

At Pearl Haven, learning extends beyond the classroom. Through extracurricular opportunities, including youth council, a culinary program, hula, choir, athletics, and on-campus clubs, clients can explore various areas of interest in an engaging setting. The newly renovated facility features bedrooms, state-of-the art classrooms, gathering spaces to relax and socialize, a commercial kitchen and dining area, demonstration kitchen for teaching, multipurpose room, outdoor recreation spaces and sports courts, gardens, therapy rooms, and more.

Pearl Haven will offer a variety of cultural programs through the weekly schedule. Youth will have the opportunity to take Hula classes, learn to play the ukulele, sing in choir, work in the lo'i, garden and take care of the *aina*. Dance, yoga, martial arts and other physical activities will help youth connect with their bodies and move through their healing.

### Health and Nutrition

Pearl Haven's programming addresses the whole child. This holistic approach focuses not only on the youth's mental health, but also physical, emotional and spiritual as well. Health and Nutrition classes help teach youth the importance of eating well and exercising. The gardening and culinary program help youth learn to grow and prepare healthy food. The kitchen manager and volunteer chefs help youth learn culinary skills and provide education on nutrition and healthy lifestyles.

## Reintegration

Research into effective reintegration and aftercare planning for youth has found that bridging the gap between residential care and community-based resources is essential to the youth's long-term success. Thus, Pearl Haven begins the discharge and transition planning process immediately (specifically during the pre-admission meeting), so that the youth is connected to the appropriate community resources throughout her time in our care and has developed a strong network of support long before she leaves. Pearl Haven follows an integrative approach to transition planning that maximizes collaboration and resources, including the youth, her family (when appropriate), and resources provided by community-based service providers.

### 1.3. Project Location

The project is located at 58-130 Kamehameha Highway on the North Shore of the Island of Oahu between the communities of Sunset Beach and Kahuku (Figure 1-1). The site is identified as Tax Map Key: (1) 5-8-001:051 and covers 12.854 acres of land zoned for agriculture (Figure 2). It is bounded on the north by vacant land, on the south by the University of Hawaii Waiale'e Agriculture Experiment Station, on the east by Kamehameha Highway and the Pacific Ocean and west by steep land on the cliffs of the northern portion of the Island. Latitude and longitude are as follows:

**Lat. 24°41.22' N Lon: -158° 1.32 W**

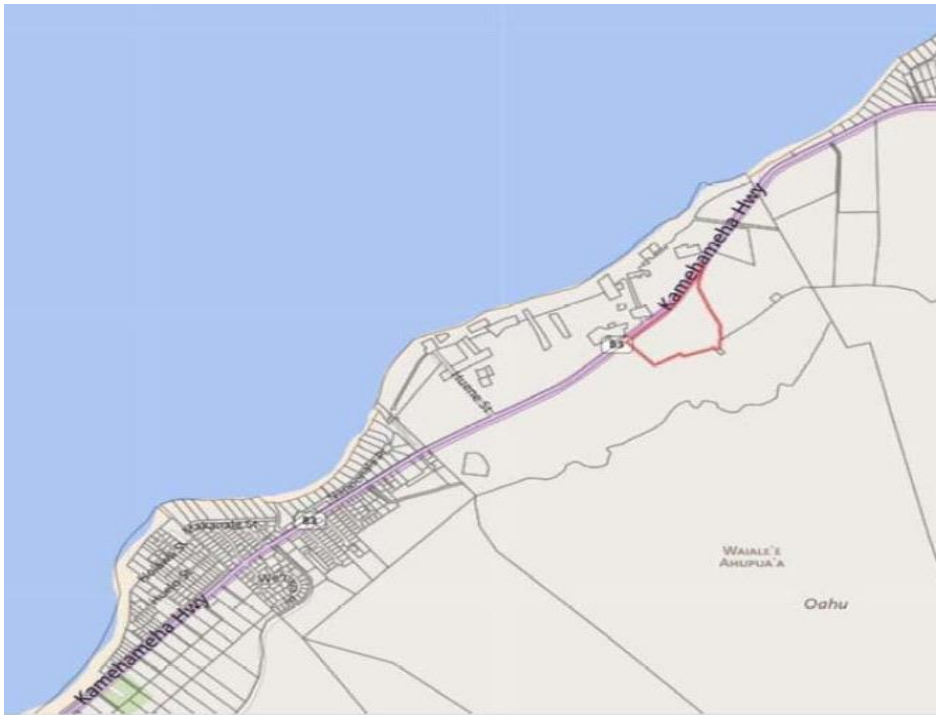
The subject property is in the State agriculture District and the County agriculture Zone (Ag-2).

The parcel is located entirely within the Special Management Area (SMA) due primarily to its proximity to the coastline. It is also within the revised Tsunami Inundation zone.

Residential Areas are located 3/4 mile to the northeast at Kawela Bay and 1/2 mile to the southwest at Sunset Beach, as seen in Figure 1-3.



*Figure 1-1 The approximate location of the Ho'ola Nā Pua's Pearl Haven on the North Shore of Oahu, Hawai'i.*



*Figure 1-2 Parcel Map of the subject property 12.84 acres*



*Figure 1-3. The project is located at 58-130 Kamehameha Highway, outlined in red. Residential areas of Sunset Beach, to the southwest, and Kawela Bay, to the northeast, are indicated by arrows.*

## 2.0 Proposed Action

The proposed actions covered by this Environmental Assessment are included in the recently completed Pearl Haven Master Plan by Miyahara and Associates (Figure 2-1). Components of the Master Plan include:

1. Renovation of the former dormitory from The Waialeʻe Boys School, which was built in 1917, utilized until 1950, and burned in 2003.
2. Construction of sports fields, a riding center, gardens, hiking trails and related amenities for the residents of Pearl Haven,
3. Construction of agricultural structures (barn, horse stalls, and tack room),
4. Construction of up to 6 cottages for staff housing.
5. Installation of a farm stand to sell vegetables grown on the site.

### 2.1 The Pearl Haven Pavilion

The existing ruin of the Boys Dormitory is comprised of four concrete walls, gabled at two ends with window and door openings and two decorative entry portals on the north side. Hoʻola Nā Pua intends to renovate the structure into a safe and functional space that can be used for exercise, meditation and events. The character defining features will be retained and the appearance from the outside would be largely unchanged. It will remain an open-air space surrounded by natural landscaping and cool trade winds. The historic character-defining features of the building will be retained, and its long history will be learned. The structure as it now stands casts a dark shadow of institutional incarceration of children during the last century. Through restoration, Hoʻola Na Pua can make it a place where history is changed by letting sunlight shine into a previously dark and forbidding building. Hoʻola Nā Pua hopes that the analogy is not lost on the residents of Pearl Haven. Renovation of the structure not only provides healing space, but it also eliminates the current attractive hazard for the residents of Pearl Haven.

Work anticipated for the structure includes:

Exterior Concrete Walls: Concrete spall repairs as needed to maintain structural integrity and wall integrity  
Window and Door openings: Any potentially injurious metal flashing remnants will be removed. If needed, new flashing or framing to protect the opening or to cover any potentially dangerous elements will be installed. Door and window openings will be left open.

Basement and Moat: The basement level is partially below grade, with the ground removed around the building to allow exterior access and windows, creating a “moat” around the outside of building. The retaining walls around this moat are failing, and this below grade open area also creates drainage and safety concerns. In order to improve safety and address drainage, the moat (below-grade open area around the basement level) will be filled in at the grade level up to the building exterior wall. The basement level windows would be infilled, leaving a reveal to indicate the size and location of the original openings, or possibly having a small window at the top of the original opening. The moat would not be infilled at the front side of the building by the stair leading to the basement level or at the door so that access to the lower level would still be available.

First Floor: A new floor structure will be constructed at the first-floor level. A railing will be installed along the building first floor interior at the window openings to meet code safety requirements due to the distance to the ground level below.



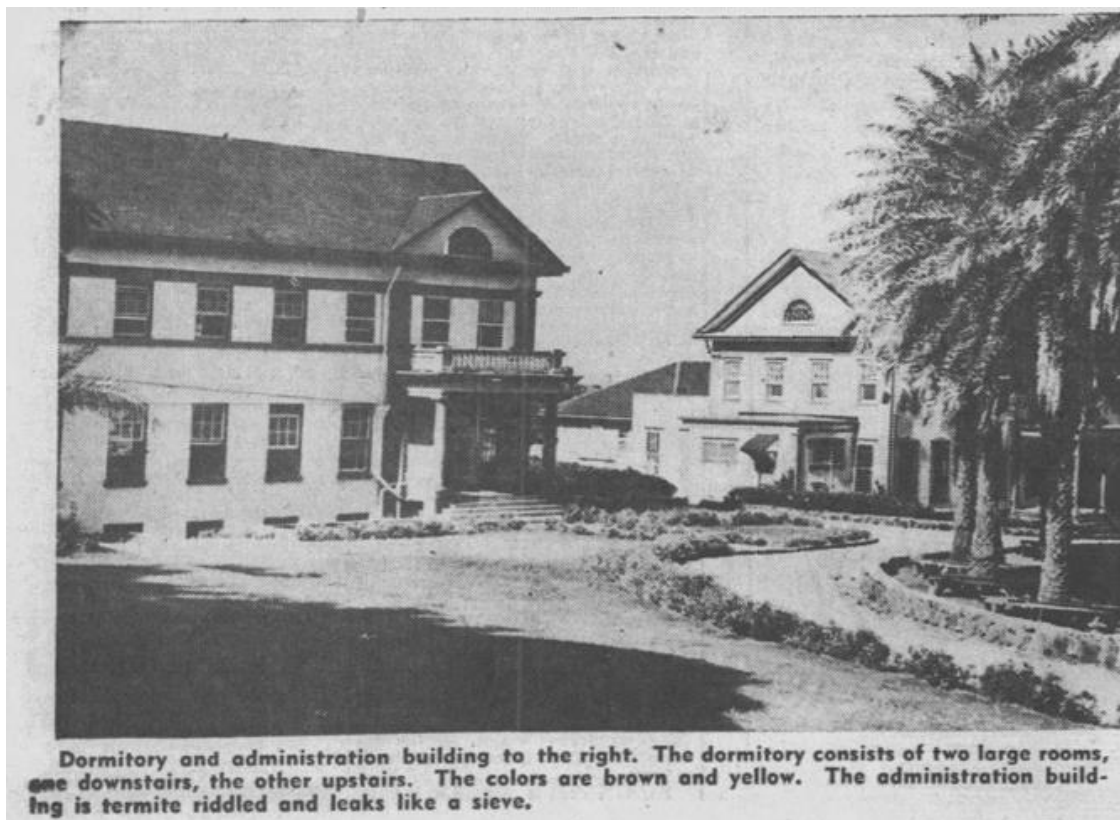


Figure 2-1: Pearl Haven Master Plan prepared by Miyabara and Associates (2021)



*Figure 2-2: An image of the Boy's Dormitory and Administration Building from Honolulu Star Bulletin, December 1930. The administration building was demolished in the 1950s*

*Figure 2-3: An undated photo of the dormitory during the early 1900*







*Figure 2-4: A 2018 view of the remnants of the Boy's Dormitory from the north showing the building's front elevation.*

Structure: A structural analysis will be undertaken to determine the best and least obtrusive methods to install new structural members to ensure the structural stability of the building. Potential solutions may include installing new roof trusses or other members to connect the upper walls. Other new structural members may be required to provide needed shear strength. The installation of new members will be minimized as much as possible and will be kept to the building interior. An initial structural analysis was conducted, and a proposed system is shown in the renderings; this system would utilize concrete columns and steel truss and horizontal framing.

Utilities: New electrical and water lines will be installed. These will be kept out of view as much as possible. A food preparation area may be constructed at the first floor if it is determined that there would be a need for it. This would be very simple with a counter and possibly a sink.

Site: Grading will occur around the structure to help route water away from the building.





*Figure 2-5: A view of the south side (rear) of the building and the moat in 2020.*





*Figure 2-6: A view of the existing building interior looking toward the north-east, 2020*

Architects Hawaii, Inc. has prepared conceptual plans and the renditions appearing below for the renovated Pearl Haven Pavilion.



*Figure 2-7: A front view showing existing concrete walls and decorative entries as they will be upon completion*



*Figure 2-8: A view from the west showing the side entrance and open roof structure.*





Figure 2-9: The view from north showing roof structure, infill of "moat", new railing at stairs leading to basement



Figure 2-10: The view of interior showing new structure and railings at window openings due to distance to ground outside

## 2.2 Sports Fields, Riding Center, Gardens, Hiking trails and related amenities



Figure 2-11: Pearl Haven Master Plan

The grounds of the facility will be improved to provide outdoor aerobic activity, space for relaxation and therapeutic interventions, and opportunities for hiking in the woods. A full-sized soccer field will be constructed in the southwestern portion of the property. Activities will include soccer, ultimate frisbee and other field sports. An equestrian center containing horses, stables, and a tack room will be constructed in the northwestern portion of the grounds near the entrance. Equine therapeutic intervention is essential with this population of traumatized children. Two multi-purpose sports courts are envisioned for the north central portion of the property to provide opportunity for team sports for the residents of Pearl Haven.

Gardens and other landscaped features planned for the site include:

- A tropical fruit orchard containing oranges and mangos,
- Flower, herb and vegetable gardens,
- A heritage garden that showcases native plants and their uses,
- A serenity garden that provides seating beneath existing large trees, and
- A truck farm for cultivating vegetables for sale and internal consumption.

Hiking trails planned for the site are a healing path that winds through the gathering place and serenity gardens and a nature trail that is located in the forest behind the facility.

## 2.3 Agricultural Structures

A “tractor barn” with dimensions similar to 40 x 60 feet will be built in the north central portion of the site, adjacent to the multi-purpose courts. The barn will be used for storage of agriculture and landscape equipment, maintenance supplies, recreational equipment, and related equipment and supplies required for operation of the facility. The barn will be designed to complement the surrounding areas and may include a mezzanine to be used for the maintenance office. The barn design is not specified at this time. The riding area is shown to have four pavilions for horse stalls or riding related use. One of the four structures is likely to be used for storing riding equipment, tack, and horse grooming supplies. The remaining three would be for horses.

## 2.4 Staff Housing

Pearl Haven is located in a relatively isolated portion of the island. It is more than 1-hour drive to most locations in urban Honolulu, 40 minutes to Kaneohe, and 20 minutes to Haleiwa. Acquiring and retaining dedicated staff to cover 24 hour a day operation will be facilitated by the ability to provide housing to the management staff, whether temporary or permanent. Six small staff houses will be constructed on the northwestern side of the property to accommodate management staff. Four will be used for full-time staff members and two will be reserved for visiting researchers and consultants. Housing units will be either studio apartments or 1-bedroom cottages that fit the rural ambiance of the facility. The design of staff housing may be similar to those pre-approved home packages offered by HPM Building supply. One model is shown below.



Figure 2-12: Example of the type of housing for resident Staff and visiting researchers.

## 2.5 Farm Stand

The proposed farm stands will be located on the northwest point of property where it meets Kamehameha Highway. Up to 6 covered tables will be built in a half circle with a parking area off of the Highway. The farm stand will be located outside the perimeter fence and be isolated from the rest of the facility by vegetative buffers such as Bougainvillea, Ohai Ali'i, or Panax. Security cameras will be used to reduce vandalism and loitering after hours.

## 2.6 Other Site Improvements

**Wetland Restoration:** Waiale`e Stream is an intermittent stream, which forms the northeast boundary of the Pearl Haven property. The stream bed is considered a freshwater forested shrub wetland by the State of Hawaii despite being normally dry. It runs only during the heaviest rains. Pearl Haven is considering improving the wetland to provide habitat for avifauna and plants. The wetland may provide a buffer for stormwater runoff by slowing down the first flush of stormwater during heavy rainfall events. This is important because the first flush contains the majority of pollutants, sediments and debris. Reducing the velocity of stormwater facilitates infiltration and prevents chemicals, sediments and debris from entering the ocean. If there is sufficient water the area may be planted with Kalo or wetland plants. Permits including a Clean Water Act permit under Section 404 for construction in a wetland will be required prior to excavation.

**Other landscaping:** The majority of the property will contain landscaping to create pathways and enclaves for the residents. This landscaping will be supported by irrigation and maintained by the staff. One of the principal landscaping tools will be to obscure the view of the facility from the Kamehameha Highway.

**Perimeter Fence:** The perimeter fence was discussed in the initial EA for restoration of the former Convalescent home; however, it was not completed during the initial stages of development. The perimeter fence will be improved to encircle the entire property boundary with exception of the wetland and farm stand areas.

**Lighting:** Low-wattage down-lighting will be installed at various locations throughout the property. The purpose of new lighting is to assist the residents, staff and security personnel to walk the grounds after dark. Upward facing and flood lights will be avoided.

## 2.7 Permits and Approvals

State and County permits that may be required are listed below:

<b>Permit or Approval</b>	<b>Approving Agencies</b>
Environmental Assessment	Department of Land and Natural Resources
Special Management Area (SMA)	Department of Planning and Permitting
Clean Water Act Section 404	US Army Corps of Engineers
Building and Grading	Department of Planning and Permitting

## 3.0. Environmental Setting, Anticipated Impacts, and Mitigation Measures

### 3.1 Existing Land Use

The subject property has been used for purposes similar to that proposed for over 100 years. The longest period that did not serve patients since 1903 is between 2014 and present. The initial permitting and public disclosure was completed in 2015 and the main buildings underwent renovation for much of the time that the facility was not in service. Approximately half of the 12.8 acres are mowed and maintained. The other half is overgrown with Kiawe, Haole Koa and other invasive species. Renovation of the main structures and the proposed mission to provide a residential treatment center for child victims of sex-trafficking was discussed in a previous Environmental Assessment. That FEA was



published in June 2015<sup>1</sup>. An employee housing quarters was demolished in 2015. Ho'ola Na Pua may have retained that building if it were inhabitable, but the structure was severely impaired by termite damage. The shell of the dormitory of the Waiale'e Industrial School remains on the property and is the primary subject of this assessment. Adjacent land use is vacant agricultural land. The subject property is accessed by Kamehameha Highway. The nearest District Park is Waiale'e Beach Park located seaward (Makai) of Kamehameha Highway about 1000 feet from the main building on the property. The project site is located 1.5 miles north west of Sunset Beach. The nearest residential communities are approximately ½ mile south at Sunset Beach, 0.4 miles north in an equestrian community, and 0.9 miles north at Kawela Bay. The property immediately surrounding the site is either undeveloped, vacant, agricultural or the University of Hawaii's Waiale'e Agricultural Experiment Station. The Ag Experiment Station has been recently cleared and may be under renovation or lease.

### *Impact and Mitigation*

The proposed action will continue the land use for which the property has been developed. Its earliest use was as a reform school. Since the zoning regulations were adapted the facility has been classified as health services, and the buildings identified as group living facilities. The City and County continues to classify the proposed use as a group living facility and the activity as Health Services. A Conditional Use Permit (major) (CUP) was required by the City and County as part of the initial development. Terms and conditions of the CUP will be intended to minimize the impacts of the proposed operations and the integrity of its operators to stick to the intended purpose. There will be no impacts to the current inventory of agricultural land. Agricultural activities for Pearl Haven will be similar to those practiced during the early years of the Waiale'e Training School, where the residents grew livestock and vegetables for their own use and sold the excess. Most land-use activities associated with the proposed action will be similar if not identical to the uses on the parcel between 1903 and 1954. As a result of the proposed action the uses will be permitted rather than grandfathered. This may be considered a positive impact associated with the proposed action.

## 3.2 Socioeconomic Characteristics

Waiale'e is near the boundary between the Pupukea and Kahuku Census Designated Places (CDP) As of the 2010 census, Pupukea (including the community of Sunset Beach) contained 4,250 people, 1,455 households, and 937 families. The population density was 1,250 people per square mile. The racial makeup of the CDP was 55.95% White, 14.56% Asian, 6.52% Pacific Islander, 1.18% from other races, and 20.89% from two or more races.

Over the same period Kahuku CDP contained 2,097 people, 509 households, and 401 families. The population density was 2,150 people per square mile. The racial makeup of the CDP was 11.06% White, 26.85% Asian, 27.28% Pacific Islander, 1.05% from other races, and 33.33% from two or more races.

Pupukea CDP contained 1,455 households out of which 32.8% had children under the age of 18 living with them, 10.3% had a female householder with no husband present. 3.4% had someone living alone

---

<sup>1</sup> [http://oeqc2.doh.hawaii.gov/EA\\_EIS\\_Library/2015-07-08-OA-FEA-Hoola-Na-Pua-Special-Treatment-Facility.pdf](http://oeqc2.doh.hawaii.gov/EA_EIS_Library/2015-07-08-OA-FEA-Hoola-Na-Pua-Special-Treatment-Facility.pdf)

who was 65 years of age or older. The average household size was 2.92 and the average family size was 3.35.

Kahuku CDP contained 509 households out of which 43.2% have children under the age of 18 living with them, 14.3% had a female householder with no husband present. 11.0% had someone living alone who was 65 years of age or older. The average household size was 3.96 and the average family size was 4.63.

In Pupukea 23.6% of the population is under the age of 18, and 7.3% were 65 years of age or older. The median age was 34 years. This compares with Kahuku where 35.4% of the population was under the age of 18, and 12.7% were 65 years of age or older. The median age was 28 years.

In Pupukea the median household income was \$56,146, and the per capita income for the CDP was \$25,682. About 11.4% of families and 15.2% of the population were below the poverty line (Wikipedia, 11/2011).

In Kahuku the median household income in the CDP was \$39,135, and the per capita income for the CDP was \$12,340. About 14.6% of the population and 11.8% of families were below the poverty line.

Many workers in this location commute to other places for employment. The primary source of employment on the North Shore of Oahu is farming, and tourism related. Skilled and unskilled labor for the proposed facility may originate from either Pupukea, Kahuku, or elsewhere on Oahu.

### 3.3 Weather and Climate

The vicinity of the subject property typically has a warm, wet, and windy climate. Prevailing tradewinds arrive from the northeast. According to the National Weather Service Honolulu Office, over a period of 30 years, normal monthly high temperatures range from 79.1 degrees in January to a high of 86.7 degrees in August for an average of 82.9 degrees. Normal month low temperatures range from a low of 65.6 degrees in February and a high of 72.5 degrees in August for a monthly average of 68.9 degrees. Precipitation typically ranges from 0.70 inches in August to a high of 5.2 inches in January (Sunset Beach). Rainfall increases dramatically with uplift provided by the seaward cliffs, but the majority of that falls further inland than the subject property.

### 3.4 Topography, geology and soils

The project site is relatively flat, has been graded and cleared, and lies on a coastal plane. The project site and surrounding areas are relatively flat and devoid of any significant natural features. About 5 out of the 13 total acres are cleared; majority of cleared space covered in St. Augustine grass. Geology is volcanic soils interspersed with calcareous marine deposits. 76% of the project site is located on soils classified as Waialua silty clay (WkB, 3 to 8% slopes according to the *Soil Survey of Islands of Kauaʻi, Oahu, Maui, Molokai, and Lanai, State of Hawaiʻi* by the U.S. Department of Agriculture Soil Conservation Service. There is no known evidence of hazardous materials, solid wastes or industrial land use that may suggest on-site contamination. More characteristics are described below.



**WkB—Waiialua silty clay, 3 to 8 percent slopes****Map Unit Setting**

- *National map unit symbol:* hqjd
- *Elevation:* 10 to 100 feet
- *Mean annual precipitation:* 25 to 50 inches
- *Mean annual air temperature:* 72 to 75 degrees F
- *Frost-free period:* 365 days
- *Farmland classification:* Prime farmland if irrigated

**Map Unit Composition**

- *Waiialua and similar soils:* 100 percent

**Description of Waiialua Setting**

- *Landform:* Alluvial fans
- *Landform position (two-dimensional):* Footslope
- *Parent material:* Alluvium

**Typical profile**

- *H1 - 0 to 12 inches:* silty clay
- *H2 - 12 to 60 inches:* silty clay

**Properties and qualities**

- *Slope:* 3 to 8 percent
- *Depth to restrictive feature:* More than 80 inches
- *Natural drainage class:* Moderately well drained
- *Runoff class:* Low
- *Capacity of the most limiting layer to transmit water (Ksat):* Moderately high (0.20 to 0.60 in/hr.)
- *Depth to water table:* More than 80 inches
- *Frequency of flooding:* None
- *Frequency of ponding:* None
- *Available water storage in profile:* Moderate (about 8.4 inches)

**Interpretive groups**

- *Land capability classification (irrigated):* 2e
- *Land capability classification (nonirrigated):* 3c
- *Hydrologic Soil Group:* C

### *Impact and Mitigation*

Site improvements require grading and grubbing permits which have been obtained and will be completed in accordance with the best management practices that are required by the City and County of Honolulu. Water service pipes and other utilities will be installed requiring a small amount of trenching. NPDES Form C Stormwater Permits have been obtained for land clearing and grading. The subject property has a relatively flat topography; all grubbing and grading will be done using best management practices and approved sediment control measures. Significant impacts to local soils or runoff will be mitigated by the use of best management practices.

### 3.5 Surface Water and Drainage

The subject property is approximately 800 feet from an unprotected coast of the Pacific Ocean on the North Shore of Oahu. Surface elevation of the site is gently sloped over the majority of the property. Elevations range from 15 feet to 78 feet above mean sea level. The intermittent Waiale`e stream forms north boundary of the property, and an ancient fishpond is located 380 feet west of the site on the seaward side of Kamehameha Highway. The coastal areas near the north point of Oahu are relatively arid near the coastline and getting wetter with distance inland as a result of the tradewind showers. The Waialua silty clay has a relatively high permeability, reducing the potential for runoff, particularly in the flat areas of the parcel. The area is subject to occasional winter storms that drop rainfall in quantities that are not absorbed by the ground. Runoff from the impervious surfaces are normally absorbed in the grassed and wild buffer areas on the parcel, but during heavy storms runoff would exit the site along Kamehameha highway and travel seaward to the areas now designated as Waiale`e Beach Park where soils consist primarily of sand. Run-on to the property is limited by the steep cliffs on the landward (mauka) side of the property.

According to *The Flood Insurance Rate Maps*, (DLNR, 2015)<sup>2</sup> the majority of project site is located in Zone X. Zone X is an area determined to be outside of the 0.2% annual chance floodplain. No base flood elevations or depths are shown within this zone. The undeveloped areas on the makai edge of the parcel are within the AE zone having a flood elevation of 15 feet.

---

<sup>2</sup> <http://gis.hawaiiinfip.org/FHAT/>

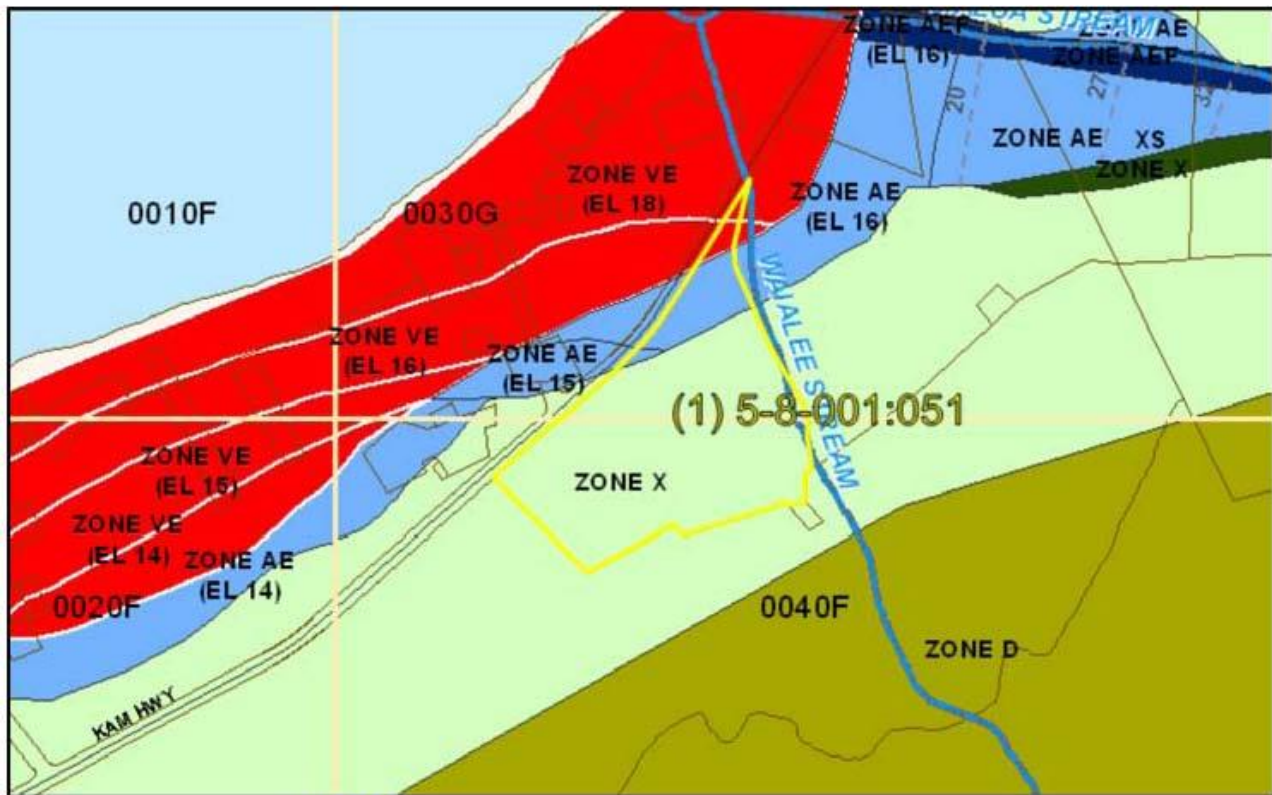


Figure 3-1: Flood insurance rate map of the project site.

Zone AE indicates a 1% annual chance of being flooded as determined by FEMA detailed methods. AE is commonly called the 100-year flood zone. This flood zone carries some development restrictions and requirements. The AE portions of the property are not developed. The majority of the parcel is in Flood Zone X. Flood zone X has a less than 0.02% annual flood probability. In other words, it is outside of the 500-year flood zone, which is normally considered safe. The existing structures are in Flood Zone X.

The revised *Civil Defense Tsunami Inundation Maps* for Oahu indicate that the tsunami evacuation area (TEZ) extends mauka of Kamehameha Highway and roughly corresponds to the portion of the parcel that is within the AE flood zone. The developed portions of the property are in the extreme tsunami evacuation zone (EXTEZ), which is higher than any tsunami that have been recorded in the past 100 years but still within an area that could be affected by a catastrophic tsunami.

#### Impacts and Mitigation

The proposed action will add impervious surface including the rooftops of the barn, staff housing, sidewalks, and landscape hard surface. The site soil is moderately well drained, with a water holding capacity between 0.2 and 0.6 inches per hour. Rainfall events that drop more than 0.6 inches per hour for more than one hour would be expected to result in stormwater runoff. The Rainfall Frequency Atlas of Hawaii indicates that the 1-year average. Maximum 1-hour rainfall for that area is 1.5 inches. In that instance surface water runoff would be expected to occur. Stormwater runoff would flow toward the highway ditches along Kamehameha Highway where the water is conveyed overland to Waiale'e Beach Park where it would likely infiltrate in the sandy soils surrounding the shoreline. The watershed for Waiale'e Stream is much larger than the site and originates on the windward slope of the north shore

plateau. Sustained rainfall of 0.6 inches per hour would likely result in overland flow in the stream. Surface disturbance during project construction will be managed using best management practices including soil erosion controls and soil stabilization methods required under the NPDES permit system. In the event of a major or catastrophic tsunami warning, staff will escort all personnel along an existing pumphouse road to higher ground immediately behind the buildings. The tsunami safe zone is located less than 100 yards mauka of the main building.

### 3.6 Climate Change and Coastal Hazards

Climate change reality has already become apparent on Oahu and will its impacts on nearshore and low-lying areas will continue to increase in the future. The Hawaii Sea Level Rise (SLR) Vulnerability and adaption Report<sup>3</sup> predicts up to 3.2 feet of sea level rise by the end of this century. The Hawaii Sea Level Rise Mapping Tool shows that the potential effects of SLR exposure, Passive flooding and high wave exposure all remain seaward of Kamehameha Highway in the vicinity of the subject property.

Storm Surge is also a greater concern due to warming ocean waters. The potential storm surge from a category 4 hurricane also remains seaward of Kamehameha Highway, according to the National Hurricane Storm Surge Maps<sup>4</sup>. The potential cumulative impacts of coastal hazards and property inundation are negligible to the subject property.

### 3.7 Biological Resources.

In pre-contact times the sloping uplands at the Ho‘ola Nā Pua Pearl Haven Facility location would have been reforested with native ‘ohia (*Metrosideros polymorpha*) and koa (*Acacia koa*) trees. The land with lower slope close to the coastline would be expected to have been colonized by native grasses, trees, and shrubs.

During post-contact times the area was heavily populated. A large number of *kuleana* still exist in the area, which indicates that the area was suitable for farming and fishing. In the late 1800s the area was acquired by the territorial government for use as a reform school, which encompassed the site and adjoining 700 acres. The School taught agriculture and later industrial arts. Lands were cleared and used for grazing and vegetable production. The subject property was plowed, burned, harvested, and planted in continuous cycles for 50 years. These uses greatly reduced the numbers and overall diversity of native plants, and these were gradually replaced by increasing numbers of non-native agricultural and pasture plants. A number of tree species were planted along the edges of fields to serve as windbreaks. Other species deemed to be useful or ornamental were also planted in gulches and along ditches. Many of these have proliferated and some have become invasive.

Since 1954 the subject property has been landscaped with non-native grasses over approximately 50% of its area. The remainder has been allowed to go fallow, and is in the progression of colonizing species, almost exclusively invasive. The exception is the cliffs at the rear of the property which are too steep for use. Those areas may be visited by endemic Hawaiian birds including the Oahu Elepaio (*Chasiempis sandwichensis ibidis*), Apapane (*Himatione sanguinea*) and Amakihi (*Hemignathus virens*). Other species common to the area include northern cardinal (*Cardinalis cardinalis*), spotted dove (*Streptopelia chinensis*), red-vented bulbul (*Pycnonotus cafer*), Indian myna (*Acridotheres tristis*)

---

<sup>3</sup> [https://climateadaptation.hawaii.gov/wp-content/uploads/2017/12/SLR-Report\\_Dec2017.pdf](https://climateadaptation.hawaii.gov/wp-content/uploads/2017/12/SLR-Report_Dec2017.pdf)

<sup>4</sup> <https://noaa.maps.arcgis.com/apps/MapSeries/index.html?appid=d9ed7904dbec441a9c4dd7b277935fad&entry=3>

and gray francolin (*Francolinus pondicerianus*). Feral pigs (*Sus scrofa*), Indian mongoose (*Herpestes javanicus*), rats (*Rattus rattus* or *Rattus norvegicus*), common mice (*mus musculus*), and cats (*Felis domesticus*) have spread throughout the area and have had a negative impact on native vegetation. They also are an important vector for the spread of weed species throughout the forests.

#### *Impacts and Mitigation*

The proposed action will add to the amount of human presence in the area; however, that area has been populated throughout recorded history. The use as a therapeutic residential treatment facility for youth will be a low impact use in terms of impacts on transient special status species. No impacts are noted, and no mitigation is required to support biological resources.

### 3.8. Archaeological, Cultural and Historic Resources

The Pearl Haven Pavilion discussed in Section 2.1 is not currently listed on the Hawaii Register of Historic Places, but it is eligible. Plans for restoration of the structure have been discussed with the State Historical Preservation Division's Architectural Branch and will obtain SHPD approval for the proposed renovations prior to submitting application for building permits.

The subject property is located within the Waiale'e Ahupua'a in the Ko'olouloa District of Oahu. The project site is adjacent to an area described by Cultural Surveys Hawaii, Inc. (February 2014) as part of the City's proposed development of Waiale'e Beach Park. According to Hammett et. Al. quoting Clark 1946, the place name Waiale'e means rippling or stirring waters. At one time people on shore this area could see freshwater bubbling up in small fountains on the shallow reef at low tide. The freshwater upwelling may have influenced Hawaiians in naming the area. The small island offshore is called Kuka'imanini meaning a parade of Manini fish. Cultural Surveys Hawaii (2014) reports that within the Waiale'e ahupuaa a major concentration of Hawaiian habitation and activity was focused within the coastal flats just behind the coastline. In this coastal area there was a freshwater spring that would have provided water for drinking, irrigation of lo'i and a brackish water environment for Kalou Pond. Archaeological sites were identified near the coastal flats makai of the subject property. These include:

Kalou Pond (Site 50-80-01-257) is located west of the project site near the Waiale'e Beach Park. Kalou Pond is an ancient fishpond categorized as a loko wai (altered by humans) first reported by McAllister, 1933 and later by Kikuchi, 1973). The pond is fed by an underground spring on its south end. There are two demigods associated with this pond. Malakahana and Laleikawai formed the pond where a fish hook fell and dug into the ground (Kikuchi, 1973). In addition, recent research has identified cultural layers within the beach area makai of the subject property.

The 1832 census documented the population of Oahu at 29,755, with 2,891 of those residing in the Koolauloa District. Although there are no specific numbers for Waiale'e, Cultural Surveys Hawaii speculates that the area immediately makai of the subject property may have been a fairly dense local population focused on taro farming, and marine resources exploitation. This is supported by records from the organic Act of 1850 which awarded lands to individuals. Forty-four kuleanas were recorded within the Waiale'e Ahupuaa; many of them are located makai of Kamehameha Highway near the project site. The land court awards near the ocean were primarily for Auwai and loi, while upland sites were identified as banana, dryland taro, sweet potato, sugarcane, and Koa. No land court awards are located within the subject property.

By 1853 the population of Koolulua was reduced to 1,345 persons, less than half of what it was thirty years earlier (Schmidt, 1977). Based on the 44 LCA and 21 recorded house sites, it seems that Wailee

was one of the population centers in the District. No major changes were noted until the Kahuku Sugar Mill was started in 1890 and the Oahu Railway and Land Company built rail service to Kahuku in 1899. These two developments would have a significant impact on the lifestyle and economics for the area. The immediate impact was increased population to work in the sugar fields. The 1900 census showed 2,372 people in the District, with most of the increase associated with plantation workers. This trend increased through 1970 when the District population exceeded 10,000.

The first known use of the project site was upon construction of the Waiale`e Training School for Boys in 1903. The facility is also referred to on maps and the Waiale`e Industrial School. The Territorial Legislature of 1864 authorized an act to establish an industrial and reformatory school *“for the care and education of helpless and neglected children, and also for the reformation of juvenile offenders. The objective of said industrial and reformatory schools shall be the detention, management education, employment reformation and maintenance of such children as shall be committed thereto as orphans, vagrants, truants living an idle or dissolute life, or duly convicted of any crime or misdemeanor.”*

Authorized in 1899, the Waiale`e school was not started until 1901 when the land was deeded to the Department of Education. The Waiale`e school was built to replace an older one in Kapalama. In May 1902 boys were moved from town into Waiale`e. Originally the School consisted of 650 acres construction continued in stages through 1934 when 42 separate buildings were in operation. It contained all of the lands between the cliffs and the shoreline (Figure 3-2).



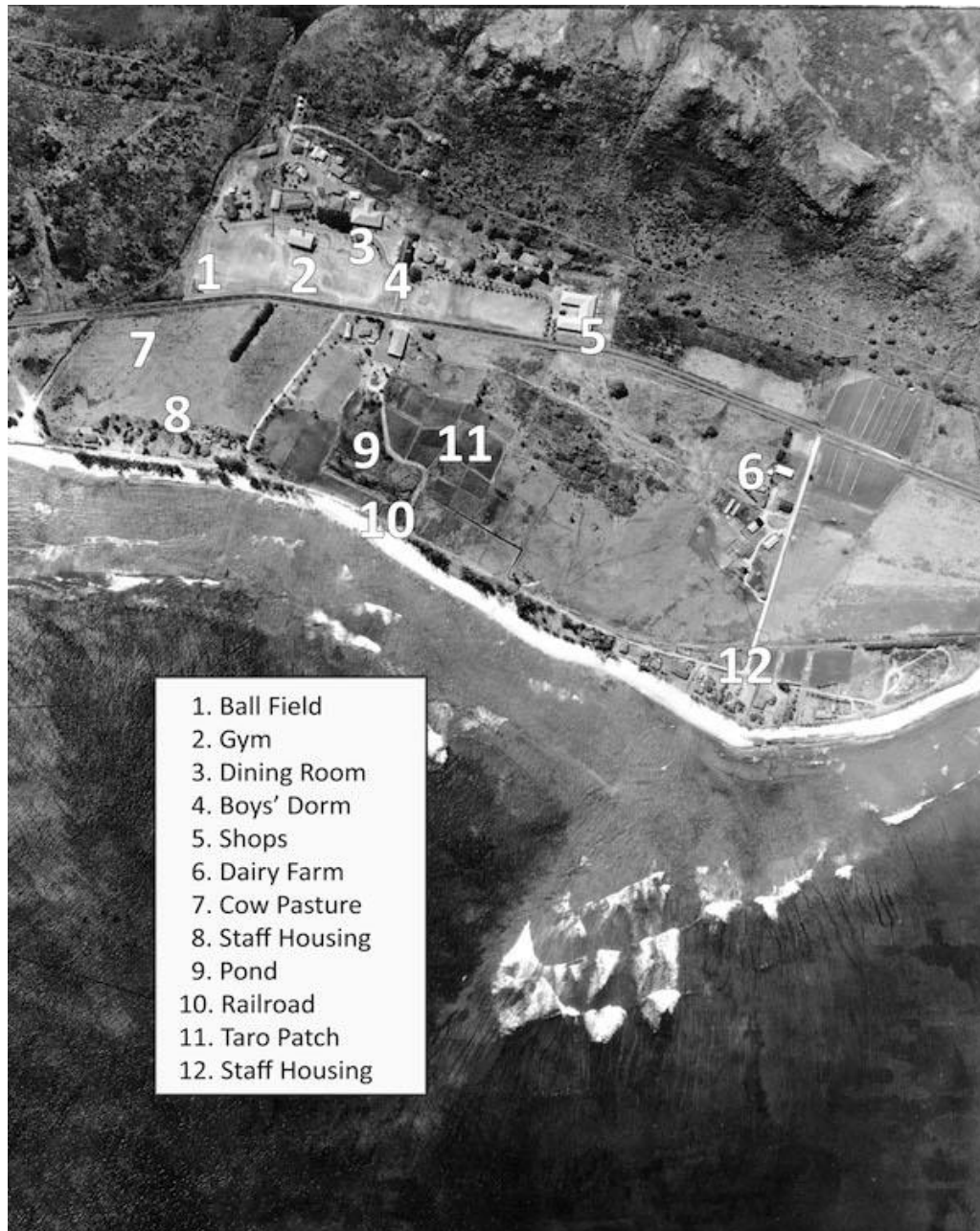


Figure 3-2: A 1949 aerial photograph of the Waialeʻe Industrial School campus in 1949. Courtesy of Stafford Ames-Morse, <http://www.ghosttowns.com/states/hi/waialeee.html>.

The shoreline extended for approximately one mile. Cultural Surveys Hawaii states that it was a major entity for change in the area. In the 1930s there were between 150 and 175 “inmates” confined to the school. Training centered on agriculture and animal husbandry (Territorial Planning Board, 1939). Consistent with the prison-type circumstances there are reports of dark cells built below ground, ball and chain restraints, shackles and leg irons, and lashings were common place. An article in the Honolulu Record (September 3, 1953) notes that 70 percent of the inmates at the Oahu Prison come from the Waialeʻe training School, which is supposedly a correction and rehabilitation home. Many of the inmates asking in their early youth to be transferred to the jail rather than withstand the brutality of the administration staff at the boys school. The inmates and staff totaled between 200 and 250 persons for

much of the school's history. The facility produced cattle, hogs, vegetables and poi for other institutions and themselves. The Waialeʻe facility was closed in 1950, when a new reform school was built in Honolulu. In 1950 Fredrick Crawford retired from the territorial hospital system and acquired the rights to the property. The main building of Crawford's Convalescent Home was completed in 1953 and the facility was opened in 1954. Crawford's Convalescent Home served residents who were elderly and required medical assistance until 2010 when low occupancy and rising costs forced it out of business. Subsequent to closing, the lessees maintained a presence until June 2014. The property was vacant between 2014 and 2017 when Hoʻola Na Pua assumed control and provided security. The facilities were damaged by vandalism, fire and theft during the period of vacancy.

### *Impacts and Mitigation*

The proposed action includes renovation of the original Boys Dormitory and improvements shown in the Master Plan. The character and original design features of the historic building will be preserved.

Impacts associated with the proposed action may be positive because the historic character and memory of the building will be retained and celebrated through use. As a result of the proposed renovation the structure will no longer be referred to as "the ruins" but assume the name of Pearl Haven Pavilion. The transition between ruins and facility amenity is considered a positive impact.

Mitigation measures required prior to its renovation will be defined in detail by the Architectural Branch of the State Historic Preservation Division. They will include documentation of the current condition of the structure by a professional architect.



*Figure 3-3: Boys Dormitory in 1935*

The existing security fence will also be expanded to enclose the majority of the parcel. Impacts associated with the addition of security fences include restricted visibility of the property. These will be mitigated using vegetative buffers which hide the fence.

Landscaping and development plans for the renovation of the other buildings were reviewed by the State Historic Preservation Division (SHPD) of the Department of Land and Natural Resources (DLNR) in 2015. The landscaping and other features of the site have been expanded and were returned to SHPD and DLNR for review as part of the early consultations. Both agencies have expressed their support for the project as proposed.

The area was inhabited by native Hawaiians before western contact. If ancient burials are found during grubbing or grading activities, a Burial Treatment Plan will be prepared for inadvertent burial discoveries encountered. In addition, consultation with appropriate ethnic groups, the procedures

outlined in Chapter 6E-43 shall be followed. A Burial Treatment Plan to be prepared after consultation with Native Hawaiians, such as the Oahu Island Burial Council and the Office of Hawaiian Affairs. A report documenting the monitoring and burial treatment work would be submitted to the Division for review and approval. The proposed action is expected to result in positive impacts on the historic structures and provide valuable services to the community.

### 3.9 Scenic and Visual Resources

The proposed action will not result in the loss of open space. The proposed action will restore the former the historical building remnants to a useful condition and provide usability improvements to the existing open space. Landscape and general maintenance will be improved over its current condition. Views of the sea cliffs rising behind the existing structures will not be occluded. The primary visual resources are toward the ocean in this vicinity. As the subject property is on the land side of Kamehameha highway coastal vistas are not impacted. The Historic dormitory structure will be restored to an attractive condition which retains the distinctive architectural features of early 20<sup>th</sup> century grandeur. The ruins will be changed from a liability to an amenity.

### 3.10 Traffic Impacts

The Facility is designed to serve a 24-hour care service for female-identifying child victims of sex trafficking with a therapeutic home providing comprehensive services specific to the unique needs of children who have been sexually exploited. The maximum density of clients is 32. The staff loading is 1 staff person per each 4 patients. The staff during the daytime shift is 10 for the 12-patient scenario, and 20 for the maximum density. Patients do not drive in and out but may have visitors. The quantity of new traffic in peak drive time morning and evening is estimated to be less than 15 vehicles. Specialists and visitors are not expected to be concentrated during peak traffic times. The increase in traffic is well below the levels that trigger traffic studies.

#### *Impact and Mitigation*

There will be a slight increase in traffic during construction. This traffic is expected to be temporary and also below the level that is expected to affect the level of service on Kamehameha Highway.

### 3.11 Noise Environment

Sources of noise within the project area are typical of rural environments. The project site has no close neighbors and is not expected to generate noise during operations that are beyond those associated with residential uses. Noise sources near the subject property will be primarily from vehicular traffic along Kamehameha Highway and lawn/landscape equipment used on the project site. Construction related noise will be minimal through most of the renovations but will be discernable during roof repair activities. The area also experiences noise from natural sources. Strong trade winds concentrate near the north point of Oahu. They are consistently in the 20 mph range, and higher on elevated ground. The North Shore of Oahu is famous for surf. During winter months surf is readily heard for nearly one mile inland from the coast.

#### *Impact and Mitigation*

Short-term and temporary noise impacts related to construction are to be expected. These will be mitigated through limiting construction to standard business hours, and best management practices.



Construction contractors will utilize best management practices to minimize the noise impact during construction operations. The subject property has few neighbors and no one within 500 feet. Noise impacts are expected to be restricted to short term construction-related noise effects on the residents and staff of Pearl Haven. These will be less than the regulatory limit of 70 Db at the property line and will not require mitigation.

### 3.12. Air Quality

The proposed project is on the north side of Oahu in an agricultural area. Air quality is generally quite good due to the predominant northeasterly trade winds that cross no land south of the Kamchatka Peninsula or the Aleutian Islands. The low levels of regulated pollutants all originate from traffic along Kamehameha Highway. Agricultural activities may a periodic source of dust.

The proposed action is not expected to be a major source of regulated air pollution during its construction or operation. Minor dust and odors may be generated during site construction.

#### *Impacts and Mitigation*

Dust and possible diesel odors would be short term temporary impacts associated with construction. A building materials inspection for hazardous building materials will be performed in advance of demolition and construction. Lead-based paint and asbestos-containing materials will be handled according to best management practices and properly disposed in advance of general construction and demolition. The majority of construction and demolition will be indoors and therefore less of an impact on neighboring properties. Worker safety from dust in enclosed spaces is the primary concern. This hazard will be mitigated by construction and demolition contractors for the benefit of their employees.

### 3.13. Public Utilities and Infrastructure

The subject property is currently operating and served by an existing County water system. The demand for potable water is less than that used by the previous tenant Crawford's Convalescent Home which was licensed for 55 beds in comparison to the 32 currently served by Pearl Haven. The improvements considered in this Assessment will require water for the four staff housing units as well as an increase in seasonal irrigation water. BWS confirms that sufficient water is available for the operation. Water conservation measures are likely to be part of the permit requirements. Electricity is provided by Hawaiian Electric Company. The demand for power has not significantly increased over the former use by Crawford Convalescent Home. The capacity for generation and transmission of power is adequate to meet the demand for the Facility.

Telephone service is supplied by Hawaiian Telephone via above ground transmission lines. No municipal wastewater collection systems are nearby. Wastewater is disposed in individual wastewater systems (IWS) which consist of septic tanks and leach fields that were designed for a greater volume than expected from Pearl Haven facility. The new employee housing expected to connect to the existing septic system following approval of a modification to the existing IWS permit.

Solid waste will be generated by the facility on a scale that is roughly equivalent to its former use. Solid waste will be collected by a private waste contractor and disposed in the County waste disposal system at H-Power or Waimanalo Gulch Sanitary Landfill.

#### *Impact and Mitigation*



The proposed action is not expected to significantly affect the capacity of any public utilities or infrastructure due to the limited size and scope of operations.

### 3.14. Public Services

The Kahuku Fire Station provides fire protection service to the project area as well as first response emergency medical service. The station is located 56-460 Kamehameha Highway in Kahuku. Response time to the project site is approximately seven minutes. Back up response will be provided by the Sunset Beach Fire Station at the intersection of Kamehameha Highway and Pupukea Road. Ambulance service is provided by American Medical Response (AMR) which will provide emergency services first to Kahuku Medical Center and secondly to Wahiawa General Hospital. Police service is provided by the Honolulu Police Department Kahuku station, which is collocated with the Kahuku Fire Station. Response time to the site by the beat patrol is approximately five minutes.

#### *Impact and Mitigation*

Pearl Haven is a service center for abused children. Its construction and operation will not significantly affect the demand for police, fire, or ambulance services. Due to its nature the facility will form close contacts with public services and comply with recommendations provided. Other public services including parks, recreational facilities and schools will not be affected by the proposed action.

## 4.0 Alternatives to the Proposed Action

Alternate locations are not considered for this phase of the facility development because they were considered in the 2015 FEA, and Pearl Haven is in operation and fulfilling its mission following a \$9 million dollar renovation. This assessment is limited to the renovation of the Pearl Haven Pavilion, staff housing and certain landscaping improvements.

### 4.1 No Action Alternative

Ho‘ola Nā Pua is now addressing the impact of sex trafficking to by providing the Pearl Haven Special Residential Treatment Center, and these alternatives have been previously addressed in the 2015 Assessment. The No Action alternative for the proposed action is to leave the historic ruins as is rather than preserving and utilizing the structure. Under the no action alternative, the primary mission of Pearl Haven would still be intact, but the ruins would remain as a tempting hazard for its residents. The structure is not structurally sound, and the immediate surroundings contain sharp rusty metal shards, pits, and broken concrete. The dormitory is fenced off with orange construction fencing; however, any determined resident could gain entry with a modest amount of effort. The proposed restoration of the structure changes it from liability to asset. The no-action alternative would not prevent Pearl Haven from accomplishing its mission, but it would make that mission significantly more stable by reducing the liability created by the ruins.

Other elements of the Master Plan also fall into the same category. Maintaining horses for the residents is not a mandatory element, but horses could contribute significantly to helping a traumatized child regain her self-worth and self-confidence.

Landscape improvements are not mandatory for the primary mission of the facility but provide a more serene and secure environment within which to operate.

Staff housing reduces the commute time for some of the facility managers and visiting staff. These improvements are not required for operation of the facility but provide important improvements for its efficiency of operation.

All of the other proposed improvements are contributing significantly to an environment that is safe, pleasant and reinforcing.

Implementation of the No Action alternative would not prevent Ho'ola Nā Pua from accomplishing its mission, but without these improvements that objective would become more difficult.

## 5.0 Relationship to Plans, Codes and Ordinances

The proposed action is restoration of the boys Dormitory, construction of supporting structures and landscape improvements. The renovation and operation of the Special Treatment Facility was discussed in the 2015 Assessment.

The facility currently operates under a number of land-use permits that were started in 1964 and amended in 2015-19.

**Special Use Permit SP64-3 (1964)** authorized use of agricultural land for Crawford's Convalescent Home. The authorization was confirmed valid in 2015 by both the State Land Use Commission (Doc 1380913) and City Department of Planning and Permitting (2015/ELOG 2708). No changes to the Special Use Permit are required.

**Conditional Use Permit 72/CUP-16 (1972)** Classified the Convalescent home as a Group Living Facility. The CUP is required for uses that may be appropriate but not specifically authorized in the Land Use Ordinance. The CUP was modified in 2016 (2016/MOD-59) to specifically allow the Ho'ola NāPua Special Residential Treatment Facility. It was further modified in 2019 (2019/Mod-1) to allow for various site improvements.

**Special Management Area Permit 2018/SMA-59 (2018):** The SMA permit was required because the site is within the SMA and any external modifications are required under the Land Use Ordinance. The SMA (minor) allowed for renovations for the buildings and grounds as well as for construction of a fence.

### 5.1 United States

#### Historic Sites Act of 1935

The Federal Historic Sites Act establishes a national policy for the preservation of historic sites, buildings and objects of national significance. It authorizes the Secretary of the Interior to designate sites of historic significance and to acquire such sites without special authorization language from Congress. It also establishes the Historic American Buildings Survey and Historic

American Engineering Record and the National Historic Landmarks program. The Boys dormitory ruins have not been identified or designated under this program.

### National Historic Preservation Act (NHPA)

The NHPA established several institutions: Advisory Council on Historic Preservation, State Historic Preservation Office, National Register of Historic Places, and the Section 106 review process.

The Advisory Council on Historic Preservation consists of 23 members from both public and private sectors, with the chairman appointed by the president. The Council's role is to advise the President and Congress on historic preservation issues, to develop policies and guidelines handling any conflicts of federal agencies, and to participate in the Section 106 review process.

The National Register of Historic Places is overseen by the National Park Service. It is the nation's official list of districts, sites, buildings, structures, and objects to be officially designated "historic properties" regardless of whether they are archaeological or historic. Being listed on or eligible for listing on the National Register does not automatically prevent damage or destruction but it qualifies these approved properties for grants, loans, and tax incentives.

The State Historic Preservation Office (SHPO) and Officer was established by the NHPA to coordinate statewide inventory of historic properties, nominate properties to the National Register, maintain a statewide preservation plan, assist others, and advise and educate locals. Because the structure is more than 50 years old the Hawaii State Historic Preservation Division must concur with the proposed improvements (See Section 4.2)

Section 106 of the National Historic Preservation Act mandates federal agencies undergo a review process for all federally funded and permitted projects that will impact sites listed on, or eligible for listing on, the National Register of Historic Places. Specifically, it requires the federal agency to "take into account" the effect a project may have on historic properties. It allows interested parties an opportunity to comment on the potential impact projects may have on significant archaeological or historic sites. The main purpose for the establishment of the Section 106 review process is to minimize potential harm and damage to historic properties. Any federal agency whose project, funding or permit may affect a historic property, both those listed or eligible for inclusion in the National Register of Historic Places, must consider the effects on historic properties and "seek ways to avoid, minimize or mitigate" any adverse effects on historic properties.

## 5.2 State of Hawai'i

HRS 226 "The Hawaii State Planning Act" was originally prepared in 1978. The purpose of this chapter was to prepare the Hawaii State Plan which serves as a guide for the future long-range development of the State; identify the goals, objectives, policies, and priorities for the State. One of the themes on which the State Plan is based is:

*Community or social well-being is a value that encompasses many things. In essence, it refers to healthy social, economic, and physical environments that benefit the community as a whole. A sense of social responsibility, of caring for others and for the well-being of our community and of participating in social and political life, are important aspects of this concept. It further implies the aloha spirit--attitudes of tolerance, respect, cooperation and unselfish giving, within which Hawaii's society can progress.*

**The Hawaii State Plan** was further divided into 12 functional plans that addressed the priority subjects. The State Health Functional Plan was prepared in 1989, but the objectives contained in these plans are still quite relevant.

Objective 3 is to *Improve access to Health Care for special populations*.

Although sex trafficking victims are not specifically referenced, the objective is clearly supported by the proposed action

**The Coastal Zone Management Act (CZMA)** ensures preservation of Hawaii's coastal resources. Coastal Zone Management requirements are addressed in HRS 205A-2, which defines the entire State as being within the Coastal Zone. Of the 11 CZM initiatives the majority apply to coastal resources. Drainage flows to the north and enters the wetland areas within Waiale'e Beach Park. The proposed project includes minimal grading if any that is required to support installation of a security fence. Fencing activities will be conducted using best management practices to reduce stormwater runoff and sedimentation of nearshore areas. Cumulative and secondary impacts associated with stormwater and coastal non-point source pollution will be entirely mitigated. In addition, the community employs low maintenance landscaping techniques that do not rely on fertilizers. Best management practices are adopted by Facility maintenance staff to reduce runoff. The remaining initiatives of the CZMA are consistent with or not applicable to the proposed action.

Under the CZMA no development shall be approved unless the authority has first found:

(A) That the development will not have any substantial adverse environmental or ecological effect, except as such adverse effect is minimized to the extent practicable and clearly outweighed by public health, safety, or Revised 1/31/06 compelling public interests. Such adverse effects shall include, but not be limited to, the potential cumulative impact of individual developments, each one of which taken in itself might not have a substantial adverse effect, and the elimination of planning options.

(B) That the development is consistent with the objectives, policies, and special management area guidelines of this chapter and any guidelines enacted by the legislature; and

(C) That the development is consistent with the county general plan and zoning. Such a finding of consistency does not preclude concurrent processing where a general plan or zoning amendment may also be required.

#### Historic Preservation (HRS Section 6E)

Section 6E of the Hawaii Revised Statutes declares the historic and cultural heritage of the State is among its important assets and that the rapid social and economic developments of contemporary society threaten to destroy the remaining vestiges of this heritage. Further that it is in the public interest to engage in a comprehensive program of historic preservation at all levels of government to promote the use and conservation of such property for the education, inspiration, pleasure, and enrichment of its citizens. Activities that may impact historic buildings fall under the Architecture Branch of the State Historic Preservation Division. The Architecture Branch participates in a variety of programs including Review and Compliance, Survey & Inventory, Certified Local Government, and Tax Credit programs.

The branch reviews federal, state and local projects impacting the built environment under Hawaii Revised Chapter (HRS) 6E and Section 106 of the National Historic Preservation Act. Staff reviews



projects for impacts to Hawai'i's historic places. In the event a project will affect a significant historic property, certain mitigative actions are necessary to reduce the potential impacts. Section 6E-7 contains the rules for historic or potentially historic structures located on State Land.

*The department may dispose of the historic property subject to chapter 171 and subject further to those reservations, restrictions, covenants, or conditions which relate to the preservation of the historic property, such as rights of access, public visitation, operation, maintenance, restoration, and repair.*

The proposed renovation of the boy's dormitory will require a plan and concurrence from SHPD prior to obtaining building permits or executing that plan.

### 5.3 City and County of Honolulu

The County General Plan was prepared in 1999, updated in 2002. A 2017 version is currently awaiting acceptance. The General Plan is a written commitment of the City towards objectives that are considered desirable and obtainable. It contains many provision to support the proposed action including:

#### Chapter 2 Economy:

Objective B6: Provide for a high quality and safe environment for visitors and residents in Waikiki and support measures to ensure visitor's and residents safety in all areas of Oahu.

So long as there is a tourism industry in Hawaii there will also be sex trade. The proposed action provides care to the most vulnerable victims of our economic engine whether they are residents or visitors.

#### Chapter 8: Public Safety and Community Resilience

Objective A1: Provide a safe environment for residents and visitors

Objective A5: Support policies and programs that expand. Access to treatment, rehabilitation, and re-entry programs for adult and juvenile offenders.

Objective 11: Encourage the improvement of rehabilitation programs and facilities for criminals and juvenile offenders.

A major problem with our law enforcement is that underage girls are treated as juvenile offenders when the majority of these girls are forced into prostitution and have few if any opportunities to escape. The proposed Special Treatment Facility is among the first assets for rehabilitation and re-entry of those who would otherwise be trapped in the cycle.

#### Chapter 9: Health and Education

Objective A 8: Support efforts to improve and expand access to mental Health, drug treatment, community-based programs and other similar programs for those requiring such services.

#### Chapter 10: Culture and Recreation

Objective B: To protect Oahu's cultural, historic, architectural, and archaeological resources.

Policy 1: Encourage the restoration and preservation of early Hawaiian structures, artifacts, and landmarks.

Policy 2: Identify, and to the extent possible, pre- serve and restore buildings, sites, and areas of social, cultural, historic, architectural, and archaeological significance.

Policy 3: Cooperate with the State and Federal governments in developing and implementing a comprehensive preservation program for social, cultural, historic, architectural, and archaeological resources.

Policy 4: Promote the interpretive and educational use of cultural, historic, architectural, and archaeological sites, buildings, and artifacts.

Policy 5: Seek public and private funds, and public participation and support, to protect social, cultural, historic, architectural, and archaeological resources.

The proposed action is supported by the County General Plan as revised 2017.

### **North Shore Sustainable Communities Plan**

The North Shore Sustainable Communities Plan was approved in 2011. Section 3.4 History and Culture endorses the following policies:

- *Emphasize physical references to North Shore's history and cultural roots to help foster the area's unique sense of place.*
- *Protect existing visual landmarks and support the creation of new, culturally appropriate landmarks.*
- *Preserve and protect significant cultural and historic features from earlier periods.*
- *Retain, whenever possible, significant vistas associated with archaeological features.*
- *Respect significant historic resources by applying appropriate management policies and practices.*
- *Restore or keep intact sites with cultural and/or religious significance out of respect for their inherent cultural and religious values.*
- *Encourage public access and use of historic and cultural resources, where appropriate and feasible.*

NSSCP is in revision in progress. The current revision reiterates that residential development be contained in the community growth boundaries. The subject property is immediately outside of the community growth boundaries, but the land use has not significantly changed since 1903. Special treatment facilities are encouraged and recommended to be within the boundaries of Waialua or Haleiwa so that there is access to public transportation. Since the residents of the special residential treatment facility are not allowed to come and go as they please it is not advantageous for the facility to be located near public transportation or within the urban growth boundaries.

The NSCC Plan generally supports restoration of the historic boys' dormitory and operation of the facility.

### **Revised Ordinances of Honolulu Section 3 Article 10**

ROH 3-10 establishes the Oahu Historic Preservation Commission. Its purpose and intent is to preserve historic properties to enhance the educational, cultural, economic and general welfare of the county. This is accomplished through of the HRS Chapter 6E on historic preservation, the Honolulu general plan and the adopted Oahu development plans.

### **ROH Chapter 21: Land Use Ordinance**

Development of the property must comply with the design standards applicable to the agricultural (AG-2) zoning district except as allowed under one of the existing land use permits. Table 5-1 compares the development standards for the Ag-2 zoning district with the planned development.

Table 5-1: Development Standards (ROH 21-3.1)

Development Std.	Required	Proposed	Comments
Min Lot Area (acres)	3-livestock/2-other uses	12.84	Facility will have livestock and other uses
Min width/depth (ft.)	150	482	
Yards front/side (ft.)	15/10	210/60	
Max Bldg. Area (%)	10	5	Approximately 24,143 sf bldg. footprint
Max Height (ft.)	15 - 25	45	
Height setback (ft.)	1 ft. for each 2 ft. above 15 ft Max height is 30 ft above std. Min side yard is 25 ft	60	Side yard is 60 ft

Sec. 21-5.290 Group living facilities.

(a) Unless directly related to public health and safety, no group living facility shall be located within 1,000 feet of the next closest group living facility.

(b) Within agricultural districts, activities associated with group living facilities shall be of an agricultural nature. As a condition of approval, dedication to active agricultural use of 50 percent or more of the project site, as the director determines is necessary to preserve the purpose and intent of the agricultural districts, for a minimum of 10 years shall be required by way of an agricultural easement or comparable mechanism acceptable to the director

The Special residential treatment facility is not located within 1,000 feet of any other GLF. Activities that are agricultural in nature occupy more than 90% of the land area within the parcel, while buildings, including the Pearl Haven Pavilion occupy slightly over 4%; parking, roadway and support areas are slightly less than 5%. The proposed improvements do not increase the floor area over that which has been in place since the early 1900s.

ROH Chapter 25 Special Management Area Ordinance

The subject property is entirely within the Special Management Area (SMA) and thus any development must be in compliance with the ROH Chapter 25 as well as the Hawaii Revised Statutes (HRS) Chapter 25A as modified by Act 16 (2020). ROH Chapter 25 assesses the permit requirements according to the estimated project valuation. Development under \$500,000 are considered minor permits and those exceeding that amount are major permits. The probable impacts of each development are assessed as significant or not significant on the same basis used for this Environmental Assessment.

**6.0 Growth-Inducing Factors, Secondary and Cumulative Impacts**

Growth inducing changes were considered positive impacts many years ago in most areas; however, many residents of our state no longer consider growth a goal to be sought after. Some developments do not have significant impacts in their construction or operation, but because of their demand they may change the price of real estate, impact privacy, or change the character of a neighborhood. Growth inducing factors such as installation of a mass transit system or opening of a department store may create significant impacts due only to their growth inducing characteristics.

A secondary or indirect impact is an impact that is caused by the proposed action but is removed in time or space from the project.

Cumulative impacts may be defined as impacts on the environment which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (federal or non-federal) or person undertakes the action (Council on Environmental Quality, 1997). For example, the impacts associated with one condominium may not be as significant as those associated with 15 condominiums.

The proposed action is to rehabilitate the ruins of a long abandoned dormitory building for use as an open air pavilion, and to install landscaping improvements. The Ho'ola NaPua Special Residential Treatment Center has received all permits and is operational. The proposed improvements are intended to improve the environment, reduce hazards, and facilitate operations for the residential treatment center. The proposed action does not increase the capacity of the facility. A positive cumulative social impact could be considered the general capacity resulting from reincorporating victims of sex trafficking into society.

### 6.1. Irreversible and Irretrievable Commitment of Resources

Implementation of the proposed project will result in an irreversible and irretrievable commitment of resources including public land, energy, and labor. Materials used for new construction may have salvage value; however, it is unlikely that such efforts will be cost-effective. The expenditure of these resources is offset by gains in construction related wages, increased tax base, secondary and tertiary spending.

### 6.2. Adverse Impacts Which Cannot be Avoided

Adverse impacts associated with the proposed action that cannot be avoided are related to short-term construction impacts including noise, dust and construction-related traffic. These impacts can be minimized by sound construction practices, Best Management Practices (BMPs), adherence to applicable construction regulations as prescribed by the Department of Health, and coordination with applicable County agencies.

## 7.0 Determination

The Hawai'i Administrative Rules Chapter 11-200(12) defines significance. If a proposed action is expected to have significant impacts, a full Environmental Impact Statement would be necessary. If the proposed action does not result in "significant" impacts the proponent is required to prepare an Environmental Assessment and Finding of No Significant Impacts (FONSI).

### 7.1 Definition of Significance

HAR 11-200 (12): In determining whether an action may have a significant effect on the environment, the agency shall consider every phase of a proposed action, the expected consequences, both primary and secondary, and the cumulative as well as the short-term and long-term effects of the action. In most instances, an action shall be determined to have a significant effect on the environment if it:



- *Involves an irrevocable commitment to the loss or destruction of any natural or cultural resource.*  
The proposed action will occupy a parcel of land that has been in similar use for over 100 years. Cultural practices will not be disturbed and the historical structure on the property will be restored.

- *Curtails the range of beneficial uses of the environment.*

The proposed project is an appropriate use that will benefit the community and is consistent with the surrounding land-use. The environment was not well served if the ruins remain abandoned and unstable, but upon completion of the proposed action it will provide a space that is utilized by both residents and guests to support the primary mission of Pearl Haven.

- *Conflicts with the State's long-term goals or guidelines as expressed in Chapter 344, HRS, and any revisions thereof and amendments thereto, court decisions, or executive orders.*

The purpose of chapter 344 is to establish a state policy which will encourage productive and enjoyable harmony between people and their environment, promote efforts which will prevent or eliminate damage to the environment and biosphere and stimulate the health and welfare of humanity, and enrich the understanding of the ecological systems and natural resources important to the people of Hawai'i. The proposed action supports the objectives of Chapter 344, by providing capacity building services to the residents of Hawaii.

- *Substantially affects the economic or social welfare of the community or State.* The proposed action will have a positive contribution to the welfare and economy of the community and State by recovering the victims of slavery and sexual abuse.

- *Substantially affects public health.*

The proposed action will have a positive impact on public health.

- *Involves substantial or adverse secondary impacts, such as population changes or effects on public facilities.*

The proposed action will benefit the community. It is not expected to create substantial population changes and secondary impacts are negligible.

- *Involves a substantial degradation of environmental quality.*

The proposed action will not degrade environmental quality with exception of short-term temporary impacts associated with noise and dust during construction. These impacts will be mitigated through best management practices imposed upon the construction contractor. Restoration of the structure will eliminate a safety hazard on the property.

- *Is individually limited but cumulatively has a considerable effect upon the environment or involves a commitment for larger actions.*

The proposed action is not part of a larger action, and its cumulative impacts may be limited to improved potential of its beneficiaries.

- *Substantially affects rare, threatened, or endangered species, or their habitats.*

According to comments from the US Fish and Wildlife Service, the proposed action will not affect any rare, threatened, or endangered species, or critical habitat.

- *Detrimentially affect air or water quality or ambient noise levels.*

Short-term temporary impacts on air quality and noise may occur during construction but will be mitigated by Best Management Practices imposed on the construction contractor.

- *Affects or is likely to suffer damage by being located in an environmentally sensitive area such as a flood plain, tsunami zone, beach erosion prone area, geologically hazardous land, estuary, fresh water, or coastal waters.*

Although portions of the parcel are located within the AE flood zone and tsunami evacuation zone (TEZ), the developed portions are located outside of the flood zone but inside the Extreme Tsunami Inundation Zone but will not have an impact on an environmentally sensitive area.

- *Substantially affects scenic vistas and view planes identified in County or State plans or studies.*

The site is on the Mauka side of Kamehameha Highway set against the north Shore sea cliffs. No significant change in elevation of the existing structures is proposed, and new structures will not impact the view plain. The proposed action will not affect scenic vistas or view planes near the project.

- *Require substantial energy consumption.*

The project will use fossil fueled equipment during construction and increase electrical energy consumption during operation. These increases are expected to be typical of previous demand at the site and are not expected to impact the area power demand for fossil fuels or line power.

## 7.2 Finding of No Significant Impact

The Hawaii Department of Land and Natural Resources (Approving Agency) and the applicant have reached a Finding of No Significant Impact (FONSI) for the proposed action following consideration of the comments received from agencies and interested parties.

## 8.0 Consulted Parties and Preparers

During preparation of the Draft Environmental Assessment the applicant contacted the following agencies for preliminary consultation:

### 8.1 Agencies and interested Parties contributing to the Assessment

These agencies and community groups provided meaningful and relevant comments which were subsequently used to modify the Environmental Assessment.

DLNR Land Division (Approving Agency)  
DLNR State Historic Preservation Division  
Department of Health, (Child & Adolescent Mental Health Division)  
The Office of Planning and Sustainable Development

Participation was requested from the following agencies and interested parties during and after the comment period for the DEA.

The Hawaii Department of Health  
Councilwoman Heidi Tsuneyoshi  
Honolulu Department of Planning and Permitting  
Honolulu Fire Department  
Honolulu Police Department  
Office of Hawaiian Affairs  
Honolulu Office of Planning and Sustainable Development  
Representative Lauren Matsumoto  
Senator Gil Riviere  
State Historic Preservation Division  
US Army Corps of Engineers  
US Fish and Wildlife Service

### 8.2 Preparers

The Final Environmental Assessment was prepared by North Shore Consultants, LLC, David Robichaux, Project Manager. The work could not have been completed in an accurate or timely manner without substantial assistance from the following persons:

Ms. Jessica Munoz, Ho'ola Nā Pua  
Ms. Jennifer Haug, Ho'ola Nā Pua  
State Historic Preservation Division, DLNR  
Ms. Katie Stevens, Architects Hawaii, Limited  
Mr. Michael Miyabara, Miyabara Associates, LLC.

Allen, Ernie. National Center for Missing and Exploited Children. Remarks for the Congressional Human Trafficking Caucus. 7/21/2009.

(Accessed 11/4/11)

<http://ejcmh.metapress.com/app/home/contribution.asp?referrer=parent&backto=issue,1,7;journal,51,62;linkingpublicationresults,1:120150,1> (Accessed 11/4/11)

[25.oHnsZFf0S6aL6ZTTV65kcg.0&utm\\_referrer=https%3A%2F%2Fwww.google.com%2F](https://www.google.com/search?q=25.oHnsZFf0S6aL6ZTTV65kcg.0&utm_referrer=https%3A%2F%2Fwww.google.com%2F)

[illegible]

Cultural Surveys Hawai'i, 2013 Archaeological Assessment for the proposed Master Plan Improvements for the Waiale'e Beach Park, Waiale'e Ahupuaa, Koolauloa District Oahu, Hawaii

<http://Hawaii.gov/dbedt/info/economic/databook/>

Hawai'i Administrative Rules Chapter 11-200 Environmental Impact Statement Rules.

<http://gen.doh.Hawaii.gov/sites/har/AdmRules1/11-200.htm>

Hawai'i Revised Statutes Chapter 343 Environmental Impact Statements. State of Hawai'i

[http://www.capitol.Hawaii.gov/hrs2009/Vol06\\_Ch0321-0344/HRS0343/HRS\\_0343-.htm](http://www.capitol.Hawaii.gov/hrs2009/Vol06_Ch0321-0344/HRS0343/HRS_0343-.htm)

Hawaii State Legislature, 2013 HB 1187 Relating to Human Trafficking.

[http://www.capitol.hawaii.gov/Archives/measure\\_indiv\\_Archives.aspx?billtype=HB&billnumber=1187&year=2013](http://www.capitol.hawaii.gov/Archives/measure_indiv_Archives.aspx?billtype=HB&billnumber=1187&year=2013)

United States Department of Agriculture, 1972 Soil Survey of the Islands of Kaua'i, Oahu, Molokai, and Lanai. Soil Conservation Service, 1972



## APPENDIX A: REQUEST FOR COMMENTS AND COMMENT RESPONSES

REQUESTS FOR COMMENTS WERE SENT TO THE FOLLOWING:

The Hawaii Department of Health  
Councilwoman Heidi Tsuneyoshi  
Honolulu Department of Planning and Permitting  
Honolulu Fire Department  
Honolulu Police Department  
Office of Hawaiian Affairs  
Honolulu Office of Planning and Sustainable Development  
Representative Lauren Matsumoto  
Senator Gil Riviere  
State Historic Preservation Division  
US Army Corps of Engineers  
US Fish and Wildlife Service  
Koolauloa Neighborhood Board



**NORTH SHORE CONSULTANTS, LLC**

**Notice of Availability**

Dear \_\_\_\_\_:

The purpose of this letter is to inform you of Publication of a Draft Environmental Assessment (DEA) for the proposed improvements to the Pearl Haven Pavilion located the Waiale`e Ahupua`a, Waialua District, Oahu (TMK (1) 5-8-001: 051, and to request information that is relevant to potential environmental impacts or issues. A courtesy copy is enclosed for your convenience. It may also be seen online in the OEQC bulletin at <http://hawaii.gov/health/environmental/oecq/index.html/>. Comments on this document will be received until August, 23 2021. We welcome all comments in writing; by email or regular mail. Comments should be addressed to North Shore Consultants with copies to DHHL. Contact information is provided below.

Each written comment will be reproduced and addressed in the DEA. If you would like to discuss the proposed project or provide less formal comments please call or email me at your earliest convenience.

Thank You,



**NORTH SHORE CONSULTANTS, LLC**

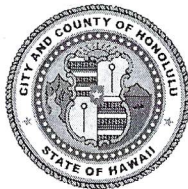
David M. Robichaux, Principal

DHHL Contact:  
Suzanne Case, Chair  
Department of Land and Natural Resources Land Division  
PO Box 621  
Honolulu, HI 96809

ATTN: Barry Cheung

DEPARTMENT OF PLANNING AND PERMITTING  
**CITY AND COUNTY OF HONOLULU**

650 SOUTH KING STREET, 7<sup>TH</sup> FLOOR • HONOLULU, HAWAII 96813  
PHONE: (808) 768-8000 • FAX: (808) 768-6041  
DEPT. WEB SITE: [www.honoluluapp.org](http://www.honoluluapp.org) • CITY WEB SITE: [www.honolulu.gov](http://www.honolulu.gov)



RICK BLANGIARDI  
MAYOR

DEAN UCHIDA  
DIRECTOR

DAWN TAKEUCHI APUNA  
DEPUTY DIRECTOR

EUGENE H. TAKAHASHI  
DEPUTY DIRECTOR

August 17, 2021

2021/ELOG-1467(CK)

Mr. David Robichaux, Principal  
North Shore Consultants, Inc.  
66-031 Mahaulu Lane  
Haleiwa, Hawaii 96809

Dear Mr. Robichaux:

SUBJECT: Request for Comments  
Draft Environmental Assessment for the  
Pearl Haven Pavilion and Master Plan Project  
58-130 Kamehameha Highway - Waialea  
Tax Map Key 5-8-001: 051

This is in response to your letter, received on July 27, 2021, requesting comments on the above-referenced Draft Environmental Assessment (DEA) for the proposed Pearl Haven Pavilion and Master Plan Project (Project), as required under Chapter 343, Hawaii Revised Statutes (HRS). We understand the Project consists of a Master Plan to carry out the ongoing renovation of structures to create a residential recovery facility (group living facility [GLF]) for children. The Master Plan proposes renovation of an existing, deteriorating former dormitory structure into an open-air pavilion for special events and training activities, as well as the incorporation of gardens, sports fields and courts, a riding center, agricultural structures, a farm stand, hiking trails, up to six cottages for staff housing, perimeter fencing, and wetland restoration at the subject property. The Department of Planning and Permitting (DPP) recommends that the following items be incorporated into the discussion and analysis of the Project in the Final Environmental Assessment (FEA):

1. Existing Land Use Permits: The FEA should discuss the Project's compliance with existing land use permits applicable to the subject property. According to our records, several land use approvals remain active.
  - The FEA should disclose that the use of the subject property as a GLF was allowed under Conditional Use Permit (CUP) No. 72/CUP-16, which was later modified (File No. 2016/MOD-59) to allow a Special Treatment Facility (STF)



for 32 residents. It was further modified (File No. 2019/MOD-1) to allow for various site improvements;

- The FEA should disclose that the various site improvements authorized under Minor Modification No. 2019/MOD-1 were also subject to under Special Management Area (SMA) Minor Permit No. 2018/SMA-59; and
- The FEA should disclose the subject property was approved for a convalescent home under Special Use Permit (SUP) No. SP64-3. Following a request for a determination, both the State Land Use Commission (Doc. No. 1380913) and the DPP (File No. 2015/ELOG-2708) concluded that the Hoola Na Pua Residential STF did not need a modification to the original SUP.

2. Chapter 21, Land Use Ordinance, Revised Ordinances of Honolulu (ROH): According to our records, the Project site consists of a 559,920-square-foot zoning lot located in the AG-2 General Agricultural District. Therefore, proposed development activities must comply with the development standards applicable to the AG-2 District, except as otherwise specified in the above-referenced existing land use permits. Project compliance with these standards should be presented and evaluated in the FEA. Estimated calculations for lot coverage, floor area ratio, and building area should be presented for the entirety of the zoning lot under both the existing and proposed condition. We recommend this information be presented in a table format for ease of reference.
3. Chapter 25, SMA Ordinance, ROH. According to our records, and as noted in the DEA, the Project site located within the SMA. Currently, the DEA discusses the Project's compliance with the requirements for historic resources under the Coastal Zone Management Act, Chapter 205A, HRS. The FEA should also include analysis for all of the required components for an SMA Use Permit under both Chapter 25, SMA Ordinance, ROH, and Chapter 205A, HRS, as modified by Act 16 (2020).
4. Long term Policy Documents. The FEA should expand the narrative to include all the relevant policies and guidelines in the General Plan (GP), and how the proposed Project conforms to and aligns with them. Note that the GP is currently under review at City Council under Resolution No. 21-23.

The FEA should also expand the narrative to include all the relevant policies and guidelines in the North Shore Sustainable Communities Plan (NSSCP), and how the proposed Project conforms to and aligns with them. Note that the NSSCP is currently being reviewed for major revisions.

5. Flood Zone: According to our records, and as stated in Section 3.5 of the DEA, portions of the Project site are located within the Federal Emergency Management Agency's Flood Zones AE and VE, both of which correspond to areas subject to flooding hazards. The DEA should discuss whether any structures are proposed within the AE or VE zones, and evaluate the proposed Project's compliance with the City's Flood Hazard Areas Ordinance (Chapter 21A, ROH).
6. Climate Change and Coastal Hazards: Although the Project site is not a shoreline lot, it is located within the SMA and relatively close to the Pacific Ocean. Therefore, it may be susceptible to coastal hazards related to climate change. Mayor's Directive 18-2, issued on July 16, 2018, requires all City departments and agencies to use the *Hawaii Sea Level Rise (SLR) Vulnerability and Adaptation Report*, the *SLR Guidance* and the *Climate Change Brief* in planning decisions. The recent amendments to Chapter 205A, HRS, under Act 16 (2020), further reiterate the need to evaluate potential impacts related to coastal hazards and SLR. As such, the FEA should evaluate the site's existing topographic, geologic, and coastal environment to show whether and how the proposed development can be located outside of the areas subject to coastal hazards. The analysis should describe potential impacts and mitigation measures associated with implementation of the Project including, but not limited to, the following:
  - SLR - Potential impacts relating to SLR at the subject property, based on review of the State's SLR Exposure Area (SLR-XA) Mapping Tool, at a level of 3.2 feet.
  - Active and Passive Flooding - Potential impacts related to active and passive surface water and/or groundwater flooding, based on existing site conditions and flood mapping projections available on the State's SLR Mapping Tool.
  - Storm Surge - Potential impacts of hurricane storm surge inundation levels at the subject property during Category 1 through 4 hurricane events, based on review of the National Oceanic and Atmospheric Administration's (NOAA) National Hurricane Storm Surge Hazard Maps.
  - Potential cumulative impacts of coastal hazards and property inundation should SLR or global climate change exacerbate existing flooding or other coastal hazards that may occur at the subject property.



Relevant sources of information are available online at the following links:

- SLR Vulnerability and Adaptation Report:  
[http://climate.hawaii.gov/wp-content/uploads/2019/02/SLR-Report\\_Dec2017-with-updated-disclaimer.pdf](http://climate.hawaii.gov/wp-content/uploads/2019/02/SLR-Report_Dec2017-with-updated-disclaimer.pdf)
- State SLR-XA Mapping Tool:  
[www.pacioos.hawaii.edu/shoreline/slr-hawaii/](http://www.pacioos.hawaii.edu/shoreline/slr-hawaii/)
- Guidance for Using the SLR-XA: <https://climate.hawaii.gov/wp-content/uploads/2020/12/Guidance-for-Using-the-Sea-Level-Rise-Exposure-Area.pdf>
- Honolulu Office of Climate Change, Sustainability and Resiliency Climate Ready Oahu Web Explorer:  
[www.resilientoahu.org/water](http://www.resilientoahu.org/water)
- NOAA Storm Surge Mapping tool:  
<https://www.nhc.noaa.gov/nationalsurge/>

7. Growth-Inducing and Cumulative Impacts: According to the DEA, the proposed Project will be served by existing public infrastructure and public services. However, implementation of the Project will also entail an increase in the intensity of the use of the site over its existing condition in recent years. The DEA should further specify whether new infrastructure connections will be required to support the Project; whether the construction of such infrastructure or utility connections could result in additional development potential at the subject property or in the surrounding community in the future; and which approvals have been received or will be required for such improvements.

The DEA should also further detail any required increases in potable water use, demand for emergency fire water supply, and any other sensitive environmental or resource-related impacts, the cumulative effect of which could impact the provision of services or degradation of sensitive SMA resources in surrounding community.

Mr. David Robichaux  
August 17, 2021  
Page 5

Thank you for the opportunity to provide comments on this proposal. Should you have any questions, please contact Christi Keller, of our staff, at (808) 768-8087, or [c.keller@honolulu.gov](mailto:c.keller@honolulu.gov).

Very truly yours,



ENC: Dean Uchida  
Director



**STATE OF HAWAII  
OFFICE OF PLANNING  
& SUSTAINABLE DEVELOPMENT**

DAVID Y. IGE  
GOVERNOR

MARY ALICE EVANS  
DIRECTOR

235 South Beretania Street, 6th Floor, Honolulu, Hawaii 96813  
Mailing Address: P.O. Box 2359, Honolulu, Hawaii 96804

Telephone: (808) 587-2846  
Fax: (808) 587-2824  
Web: <https://planning.hawaii.gov/>

DTS 202108131028HE

Coastal Zone  
Management  
Program

August 19, 2021

Environmental  
Review Program

Land Use  
Commission

Land Use Division

Special Plans  
Branch

State Transit-  
Oriented  
Development

Statewide  
Geographic  
Information System

Statewide  
Sustainability  
Program

Mr. David M. Robichaux, Principal  
North Shore Consultants, LLC  
66-031 Mahaulu Lane  
Hale'iwa, Hawai'i 96712

Subject: Draft Environmental Assessment for the Pearl Haven Pavilion and  
Master Plan, Waiale'e Ahupua'a, Waialua District, O'ahu

Dear Mr. Robichaux,

Thank you for the opportunity to provide comments on the Draft  
Environmental Assessment (Draft EA) on the development of the Pearl Haven  
Pavilion and Master Plan.

It is our understanding that the applicant, Ho'ola Nā Pua, Inc., intends to  
make renovations to a former dormitory that is now in ruins on the subject parcel.  
Pearl Haven is a recently completed residential care facility on the North Shore of  
O'ahu. Ho'ola Nā Pua seeks to continue to renovate buildings that remain from  
the Waiale'e Training School, and add amenities including agricultural structures,  
sports fields, gardens, employee housing, and hiking trails. The renovated  
structure will be an open-air pavilion for special events and training.

The Office of Planning and Sustainable Development (OPSD) has  
reviewed the Draft EA and has the following comments to offer:

1. Special Management Area (SMA)

Section 1.3, pages 11, and Figure 1-5, page 12 of the Draft EA  
acknowledges the project area is within the SMA. Furthermore, Section  
2.7, page 23 lists the need of a SMA permit. The subject Environmental  
Assessment can serve as the primary supporting document for the SMA  
use permit application. OPSD suggests that the Draft EA specifically  
discuss compliance with the requirements of SMA use by consulting with  
the Department of Planning and Permitting (DPP), City and County of  
Honolulu.

Additionally, OPSD suggests that the Final Environmental Assessment  
(Final EA) provides a map of the subject property in relation the county  
SMA.



2. Coastal Zone Management Act - Federal Consistency

Section 2.7, page 23, Permits and Approvals, lists the potential need for a Clean Water Act (CWA), Section 404 Permit from the U.S. Army Corps of Engineers (USACE). The need for this permit may require a Coastal Zone Management Act (CZMA) federal consistency review.

A CWA Section 404 permit may elicit a CZMA federal consistency review. OPSD is the lead state agency with the authority to conduct this review. Therefore, if the USACE determines that the proposed renovation and construction work requires a Department of the Army permit, then, a representative from Ho'ola Nā Pua should contact our office regarding the policies and procedures governing a federal consistency review.

The national CZMA requires that federal actions be consistent with approved state coastal programs' enforceable policies. Federal actions include activities performed by a federal agency; activities that require federal permits or approvals; or state and local government projects that receive federal financial assistance.

3. Hawaii Coastal Zone Management (CZM) Program

Section 5.2, page 39 of the Draft EA provides a brief overview of what is titled the Coastal Zone Management Act. The policy questions that should be addressed in this section are associated with the objectives and supporting policies of the Hawaii CZM Program, as found in Hawaii Revised Statutes (HRS) § 205A-2.

Pursuant to HRS § 205A-4, in implementing the objectives of the CZM program, approving agencies shall consider ecological, cultural, historic, esthetic, recreational, scenic, open space values, coastal hazards, and economic development. The analysis in its current form is insufficient and does not provide sufficient detail for the approving State agency, the Department of Land and Natural Resources (DLNR), to carry out this responsibility.

To assist the DLNR in the decision-making and approval process, the Final EA should include an assessment on the project and its consistency with all 10 of the objectives and supporting policies of the Hawaii CZM Program, HRS § 205A-2, as amended. If it is determined that the project aligns with this statute, the Final EA should affirm this. If a conflict exists, the analysis should detail what steps will be taken so that the proposed action can be made to make it compatible with HRS § 205A-2. If any of these provisions are not applicable, the Final EA should state this and include the reasoning behind this conclusion. This analysis can also be applied to a potential CZMA federal consistency review. HRS § 205A-2 forms the basis of the enforceable policies of the Hawaii CZM Program that must be addressed in this review.

Mr. David M. Robichaux  
August 19, 2021  
Page 3

4. Low Impact Development

The Draft EA does not include a specific reference or discussion on the use of Low Impact Development (LID) in the project's drainage, stormwater runoff, and erosion control measures. Based on the information provided, due to the size of the project area, and its location, this proposed action may be subject to DPP requirements for LID drainage and onsite stormwater management. We advise Ho'ola Nā Pua, to consult with DPP on LID design requirements.

5. Figure 1-2: Pearl Haven Treatment Program

We note that in the Table of Contents, page 4 lists Figure 1-2: Pearl Haven Treatment Program as an inclusion in the Draft EA. However, we are unable to locate this graphic. The Final EA should correct this omission.

If you have any questions or concerns regarding this comment letter, please contact Joshua Hekeia of our office at (808) 587-2845, Shichao Li at (808) 587-2841 on SMA Use issues, or Debra Mendes at (808) 587-2840 on CZMA federal consistency related matters.

Sincerely,



Mary Alice Evans  
Director

c: Pearlyn Fukuba, Project Manager, DHHL Planning Office